American Woodmark Corporation
Hardy County Plant
390 Industrial Park Road
Moorefield, West Virginia 26836

45CSR30 (Title V)
Permit Renewal Application

May 2009

Hardy County Plant

390 Industrial Park Road ● Moorefield, WV 26836
Phone: (304) 530-1900 ● Fax: (304) 530-1999

www.americanwoodmark.com

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WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475
www.wvdep.org/daq

TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

1. **Name of Applicant (As registered with the WV Secretary of State's Office):** American Woodmark Corporation	**2. Facility Name or Location:** Hardy County Plant
3. DAQ Plant ID No.: 031-00003	**4. Federal Employer ID No. (FEIN):** 541138147

5. **Permit Application Type:**

☐ Initial Permit — When did operations commence? 11/14/1986
X Permit Renewal — What is the expiration date of the existing permit? 11/01 /2009
☐ Update to Initial Permit Application

6. Type of Business Entity: X Corporation ☐ Governmental Agency ☐ Partnership ☐ Limited Partnership	**7. Is the Applicant the:** ☐ Owner ☐ Operator X Both If the Applicant is not both the owner and operator, please provide the name and address of the other party. _____ _____ _____
8. Number of onsite employees: 450	

9. Governmental Code:

X Privately owned and operated; 0
☐ Federally owned and operated; 1
☐ State government owned and operated; 2
☐ County government owned and operated; 3
☐ Municipality government owned and operated; 4
☐ District government owned and operated; 5

10. Business Confidentiality Claims

Does this application include confidential information (per 45CSR31)? ☐ Yes X No

If yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's *"PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY"* guidance.

11. Mailing Address		
Street or P.O. Box: 390 Industrial Park Road		
City: Moorefield	**State:** WV	**Zip: 26836-8200**
Telephone Number: (304) 530-1900	**Fax Number:** (304) 530-1999	

12. Facility Location		
Street: 390 Industrial Park Road	**City:** Moorefield	**County:** Hardy
UTM Easting: 674.25 km	**UTM Northing:** 4,323.12 km	**Zone:** ☒ 17 or ☐ 18
Directions: Proceed south on Route 220 approximately one (1) mile from Moorefield, then turn right into the Industrial Park. Follow the road to its termination at the Hardy County Plant.		
Portable Source? ☐ Yes ☒ No		
Is facility located within a nonattainment area? ☐ Yes X No		**If yes, for what air pollutants?**
Is facility located within 50 miles of another state? X Yes ☐ No		**If yes, name the affected state(s).** Virginia
Is facility located within 100 km of a Class I Area[1]? X Yes ☐ No **If no, do emissions impact a Class I Area[1]?** ☐ Yes ☐ No		**If yes, name the area(s).** Dolly Sods
[1] *Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.*		

13. Contact Information		
Responsible Official: Mark Seals		**Title:** Plant Manager
Street or P.O. Box: 390 Industrial Park Road		
City: Moorefield	**State:** WV	**Zip:** 26836-8200
Telephone Number: (304) 530-1900	**Fax Number:** (304) 530-1999	
E-mail address: mseals@woodmark.com		
Environmental Contact: George "Buddy" Sherman		**Title:** EH&S Manager
Street or P.O. Box: 390 Industrial Park Road		
City: Moorefield	**State:** WV	**Zip:** 26836-8200
Telephone Number: (304) 530-1900	**Fax Number:** (304) 530-1999	
E-mail address: gsherman@woodmark.com		
Application Preparer: George "Buddy" Sherman		**Title:** EH&S Manager
Company: American Woodmark Corporation		
Street or P.O. Box: 390 Industrial Park Road		
City: Moorefield	**State:** WV	**Zip:** 26836-8200
Telephone Number: (304) 530-1900	**Fax Number:** (304) 530-1999	
E-mail address: gsherman@woodmark.com		

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Lumber Wood Products Except Furniture	Wood Kitchen Cabinets	337110	2434

Provide a general description of operations.

The American Woodmark plant is located in the Industrial Park at Route 220 South; Moorefield, West Virginia (Referred to as the Hardy County Plant). This plant mills and paints component parts for wood kitchen cabinets, which are shipped to our Assembly and Distribution Plants.

15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to "Plot Plan - Guidelines."

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

Section 2: Applicable Requirements

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
X SIP	☐ FIP
X Minor source NSR (45CSR13)	X PSD (45CSR14)
X NESHAP (45CSR15)	☐ Nonattainment NSR (45CSR19)
X Section 111 NSPS	☐ Section 112(d) MACT standards
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
X 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
X Emissions Trading and Banking (45CSR28)	☐ **C**ompliance **A**ssurance **M**onitoring (40CFR64)
☐ NO_x Budget Trading Program Non-EGUs (45CSR1)	☐ NO_x Budget Trading Program EGUs (45CSR26)

19. Non Applicability Determinations

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

a. 40 C.F.R. 60 Subparts K, Ka, Kb —Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978; prior to July 23, 1984; or after July 23, 1984 respectively.
Regardless of the construction date these NSPS standards have an applicability threshold of either 40,000 or 20,000 gallons in which American Woodmark Corporation does not satisfy. The Company's largest volatile organic liquid tank is less than 10,000 gallons. Therefore, the above referenced NSPS for tanks are not applicable to the facility permitted herein.
b. 40 C.F.R. 60 Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.
American Woodmark operates two boilers less than 15 MM Btu/hr. Boiler B3, the newest of the two, was constructed in 1998, after 1989, which satisfies the first applicability criteria for this NSPS. The other is a design capacity between 10 and 100 MM Btu/hr. Therefore boiler B3 is subject to this standard. However, as a result of an exemption for boilers less than 30 MM Btu/hr provided by 40 C.F.R. §60.63c.b. the PM emission standards do not apply to boiler B3. Additionally this boiler is not subject to any specific SO2 standards defined by the Regulation while utilizing wood as fuel type. However, when #2 fuel oil is used in the B3 boiler, compliance with this standard shall be demonstrated by obtaining a certified report from the fuel supplier for each shipment that indicates less than 0.3 weight percent sulfur. A copy of each certified report from the fuel supplier shall be submitted to the Director and to USEPA in accordance with 40 C.F.R. §60.42c (h) and 40 C.F.R. §60.48c (f) Boiler B1 was constructed in 1987, which is prior to the June 9, 1989 applicability date of NSPS Subpart Dc. Therefore boiler B1 was found to be not subject to NSPS Subpart Dc.
c. 40 C.F.R. 60 Subpart Db—Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
The second boiler incorporated by this permit was constructed in 1987 and is designated as B1. As a result of the construction date, after 1984, this boiler satisfies the first half of the applicability criteria. However, having a design capacity less than 100 MM Btu/hr does not satisfy the second part of the applicability criteria. Therefore, due to the logic stated above, boiler B1 was found not to be subject to any requirements of the NSPS Subpart Db.
d. 45CSR10 Section 4 - Standards for Manufacturing Process Source Operations. Section 5 - Combustion of Refinery or Process Gas Streams American Woodmark's cabinet manufacturing facility does not operate any manufacturing source operations or combust refinery and/or process gas streams as defined by this rule. Therefore, they are exempt from the requirements of the sections referenced above.

X Permit Shield

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*).

3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1. **[45CSR§6-3.1.]**

3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. **[45CSR§6-3.2.]**

3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. §61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(I). A copy of this notice is required to be sent to the USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health. **[40 C.F.R. 61]**

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public. **[45CSR§4-3.1 State-Enforceable only.]**

3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown. **[45CSR§13-10.5 State-Enforceable only.]**

3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11. **[45CSR§11-5.2]**

3.1.7. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality. **[W.Va. Code § 22-5-4(a)(14)]**

3.1.8. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161. **[40 C.F.R. 82, Subpart F]**

3.1.9. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71. **[40 C.F.R. 68]**

3.1.10. Boilers B1 and B3 shall comply with all applicable requirements of 40 C.F.R. 63, Subpart DDDDD - "National Emissions Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters" no later than 3 years after the date of publication of the final rule in the Federal Register. An Initial Notification as described in 40 C.F.R. §63.7545(b) shall be submitted no later than 120 days after the date of publication of the final rule in the Federal Register. The permittee shall submit a complete application for a significant Title V permit modification to include the specific requirements of 40 C.F.R. 63, Subpart DDDDD in the operating permit no less than 6 months prior to the compliance date. **[45CSR34, 40 C.F.R. §63.7495(b) and 63.7545(b)]**

3.1.11. Control of Fugitive Particulate Matter. All ash or fuel handling systems including stockpiles, open or enclosed, as well as transportation activities are required to operate and maintain a fugitive control system to minimize these emissions. **[45CSR§2-5]**

3.1.12. *Operation and Maintenance of Air Pollution Control Equipment.* The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary. **[45CSR§13-5.11., 45CSR13, Permit No. R13-2220D - (condition 4.1.15), Equipment ID (BC3, BV2, F3, DC-5, DC-6)]**

X Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:
a. The date, place as defined in this permit and time of sampling or measurements;
b. The date(s) analyses were performed;
c. The company or entity that performed the analyses;
d. The analytical techniques or methods used;
e. The results of the analyses; and
f. The operating conditions existing at the time of sampling or measurement.
[45CSR§30-5.1.c.2.A.]

3.4.2. Retention of records. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.

[45CSR§30-5.1.c.2.B.]

3.4.3. Odors. For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received. Such record shall contain an assessment of the validity of the complaints as well as any corrective actions taken.

[45CSR§30-5.1.c. State-Enforceable only.]

3.4.4.Record of Maintenance of Air Pollution Control Equipment. For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

[45CSR13, Permit No. R13-2220D - (condition 4.4.2.), Equipment ID (BC3, BV2, F3, DC-5, DC-6)]

3.4.5. Record of Malfunctions of Air Pollution Control Equipment. For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

a. The equipment involved.

b. Steps taken to minimize emissions during the event.

c. The duration of the event.

d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

e. The cause of the malfunction.

f. Steps taken to correct the malfunction.

g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

[45CSR13, Permit No. R13-2220D - (condition 4.4.3.), Equipment ID (BC3, BV2, F3, DC-5, DC-6)]

Are you in compliance with all facility-wide applicable requirements? X Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

21. Active Permits/Consent Orders		
Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit *(if any)*
45CSR13-2220D	07/12/2005	
45CSR14-2	11/14/1986	
45CSR13-1829	03/31/1995	
45CSR30-031000032004	11/01/2004	

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	102.61
Nitrogen Oxides (NO_X)	46.85
Lead (Pb)	
Particulate Matter ($PM_{2.5}$)[1]	
Particulate Matter (PM_{10})[1]	11.35
Total Particulate Matter (TSP)	45.72
Sulfur Dioxide (SO_2)	57.96
Volatile Organic Compounds (VOC)	2,586.65
Hazardous Air Pollutants[2]	Potential Emissions
HAPs	4.57
Formaldehyde	0.05
Regulated Pollutants other than Criteria and HAP	Potential Emissions

[1] *$PM_{2.5}$ and PM_{10} are components of TSP.*
[2] *For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.*

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)		
☒	1.	Air compressors and pneumatically operated equipment, including hand tools.
☐	2.	Air contaminant detectors or recorders, combustion controllers or shutoffs.
☒	3.	Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
☒	4.	Bathroom/toilet vent emissions.
☒	5.	Batteries and battery charging stations, except at battery manufacturing plants.
☐	6.	Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
☐	7.	Blacksmith forges.
☒	8.	Boiler water treatment operations, not including cooling towers.
☒	9.	Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
☐	10.	CO_2 lasers, used only on metals and other materials which do not emit HAP in the process.
☒	11.	Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
☐	12.	Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
☒	13.	Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
☒	14.	Demineralized water tanks and demineralizer vents.
☐	15.	Drop hammers or hydraulic presses for forging or metalworking.
☒	16.	Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
☐	17.	Emergency (backup) electrical generators at residential locations.
☐	18.	Emergency road flares.
☐	19.	Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO_x, SO_2, VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units. Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis: _____ _____ _____ _____ _____ _____ _____ _____ _____

24. Insignificant Activities (Check all that apply)		
☐	20.	Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27. Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis: _____ _____ _____ _____ _____
☐	21.	Environmental chambers not using hazardous air pollutant (HAP) gases.
☒	22.	Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
☐	23.	Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
☐	24.	Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
☒	25.	Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
☐	26.	Fire suppression systems.
☐	27.	Firefighting equipment and the equipment used to train firefighters.
☐	28.	Flares used solely to indicate danger to the public.
☒	29.	Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
☒	30.	Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
☒	31.	Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
☐	32.	Humidity chambers.
☐	33.	Hydraulic and hydrostatic testing equipment.
☐	34.	Indoor or outdoor kerosene heaters.
☒	35.	Internal combustion engines used for landscaping purposes.
☐	36.	Laser trimmers using dust collection to prevent fugitive emissions.
☐	37.	Laundry activities, except for dry-cleaning and steam boilers.
☐	38.	Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
☐	39.	Oxygen scavenging (de-aeration) of water.
☐	40.	Ozone generators.
☒	41.	Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant

24. Insignificant Activities (Check all that apply)		
		owners/operators must still get a permit if otherwise requested.)
☐	42.	Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
☒	43.	Process water filtration systems and demineralizers.
☒	44.	Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
☒	45.	Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
☐	46.	Routing calibration and maintenance of laboratory equipment or other analytical instruments.
☐	47.	Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
☐	48.	Shock chambers.
☐	49.	Solar simulators.
☐	50.	Space heaters operating by direct heat transfer.
☐	51.	Steam cleaning operations.
☒	52.	Steam leaks.
☐	53.	Steam sterilizers.
☒	54.	Steam vents and safety relief valves.
☐	55.	Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
☐	56.	Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
☐	57.	Such other sources or activities as the Director may determine.
☒	58.	Tobacco smoking rooms and areas.
☐	59.	Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

25. Equipment Table
Fill out the **Title V Equipment Table** and provide it as **ATTACHMENT D**.
26. Emission Units
For each emission unit listed in the **Title V Equipment Table**, fill out and provide an **Emission Unit Form** as **ATTACHMENT E**.
For each emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**.
27. Control Devices
For each control device listed in the **Title V Equipment Table**, fill out and provide an **Air Pollution Control Device Form** as **ATTACHMENT G**.
For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H**.

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

*Note: This Certification must be signed by a responsible official. The **original**, signed in **blue ink**, must be submitted with the application. Applications without an **original** signed certification will be considered as incomplete.*

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)	
Name:	Title:

Responsible official's signature:

Signature: _____ Signature Date: _____

(Must be signed and dated in blue ink)

Note: Please check all applicable attachments included with this permit application:	
☒	ATTACHMENT A: Area Map
☒	ATTACHMENT B: Plot Plan(s)
☒	ATTACHMENT C: Process Flow Diagram(s)
☒	ATTACHMENT D: Equipment Table
☒	ATTACHMENT E: Emission Unit Form(s)
☒	ATTACHMENT F: Schedule of Compliance Form(s)
☒	ATTACHMENT G: Air Pollution Control Device Form(s)
☒	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

All of the required forms and additional information can be found and downloaded from, the DEP website at www.wvdep.org/daq, requested by phone (304) 926-0475, and/or obtained through the mail.

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*Note: This Certification must be signed by a responsible official. The **original**, signed in **blue ink**, must be submitted with the application. Applications without an **original** signed certification will be considered as incomplete.*

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: Mark Seals	Title: Plant Manager

Responsible official's signature:

Signature: _____ Signature Date: 4/30/09

(Must be signed and dated in blue ink)

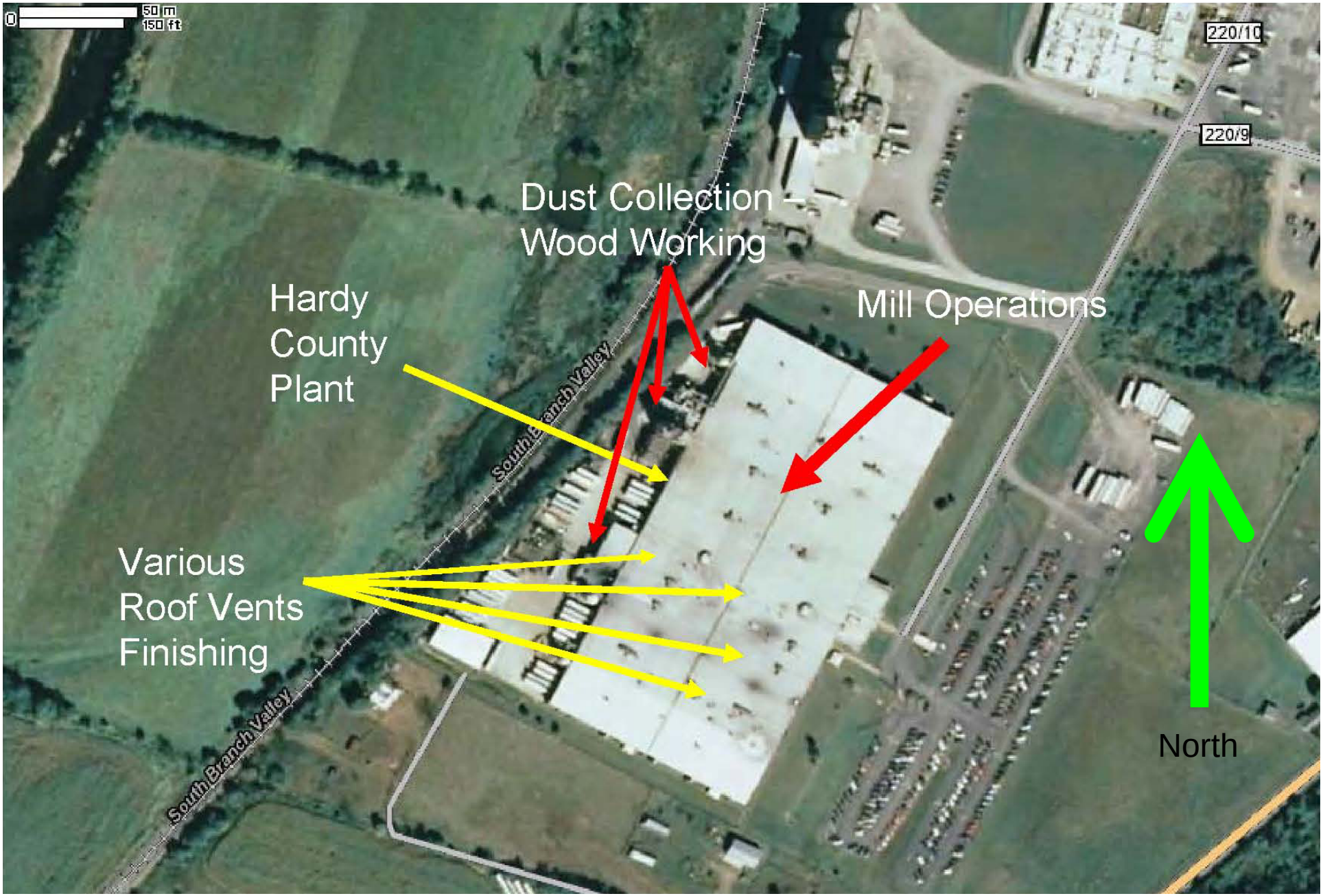
Note: Please check all applicable attachments included with this permit application:

☒	ATTACHMENT A: Area Map
☒	ATTACHMENT B: Plot Plan(s)
☒	ATTACHMENT C: Process Flow Diagram(s)
☐	ATTACHMENT D: Equipment Table
☐	ATTACHMENT E: Emission Unit Form(s)
☐	ATTACHMENT F: Schedule of Compliance Form(s)
☐	ATTACHMENT G: Air Pollution Control Device Form(s)
☐	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

All of the required forms and additional information can be found and downloaded from, the DEP website at www.wvdep.org/daq, requested by phone (304) 926-0475, and/or obtained through the mail.

Attachment A
Area Map

Attachment B - Plot Plan



American Woodmark
Plant Evacuation Routes

YOU ARE HERE

MAIN OFFICE

MEETING AREA
60
61
62
43
47
82
86
87

MEETING AREA
42
74
84

GATE

GATE

GATE

FENCE

FENCE

MAIN TRAFFIC GATE

EAST MILL

MIDDLE MILL

WEST MILL

EAST PAINT

MIDDLE PAINT

WEST PAINT

MAINTENANCE

DUST COLLECTOR

SILOS

BOILER ROOM

DUST COLLECTORS

PUMP ROOM

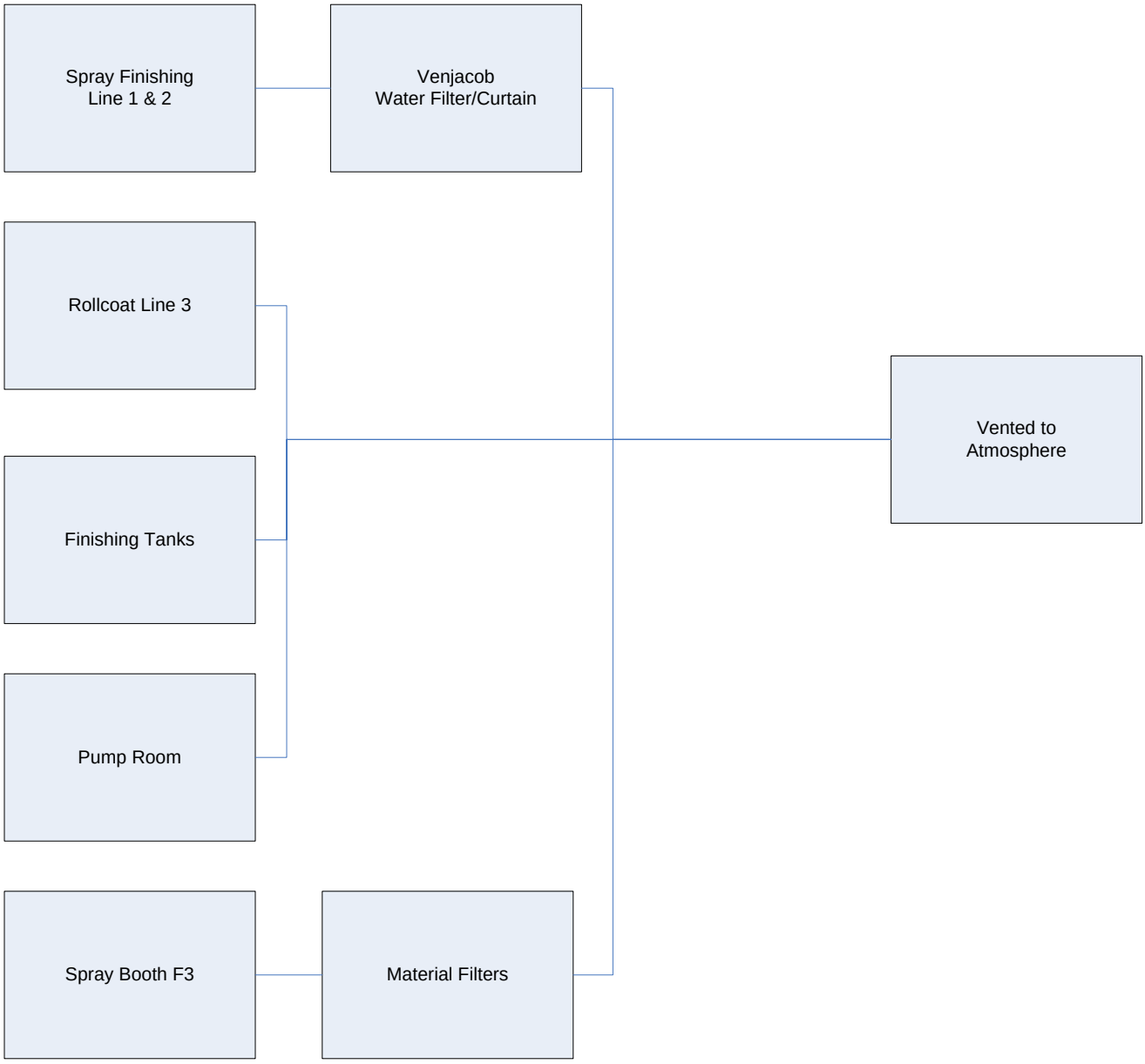
DUST COLLECTOR

DUST COLLECTOR

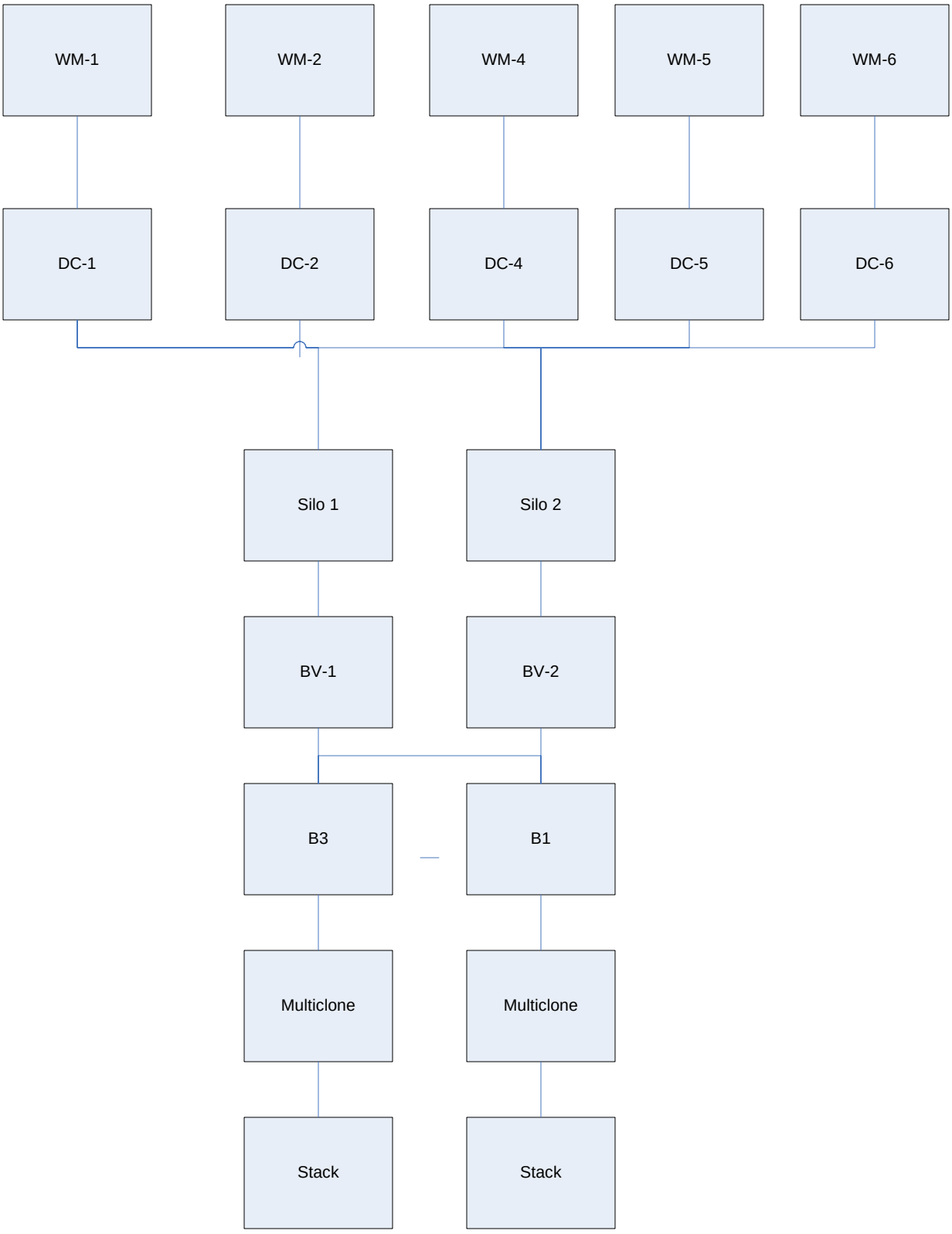
BULK STORAGE

STORAGE

ATTACHMENT C
PROCESS FLOW DIAGRAM
FINISHING



ATTACHMENT C
PROCESS FLOW DIAGRAM
MILL



ATTACHMENT D - Emission Units Table

(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Unit ID[1]	Emission Point ID[1]	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device[1]
B1	B1	Boiler #1 (wood fired)	1987	13.3 MMBtu/hr	BC1
B3	B3	Boiler # 3 (wood or #2 fuel oil fired)	1998	14.4 MMBtu/hr	BC3
WM-1	DC-1	Woodworking machinery and assembly operations (saws, drills, planers, routers, sanders, etc.) through the mill side bag house header.	1987	10,697 lb/hr Process Wt. Rate (PWR)	DC-1
WM-2	DC-2	Workworking machinery same as source WM-1 above.	1987	5,349 lb/hr PWR	DC-2
WM-4	DC-4	Woodworking machinery and assembly operations (saw, drills, planers, routers, sanders and Finishing line sanding, dusting, and denibbing machinery equipment) venting through the paint side bag house header.	1995	10,407 lb/hr PWR	DC-4
WM-5	DC-5	Woodworking machinery same as source WM-1 above.	1998	6,097 lb/hr PWR	DC-5
WM-6	DC-6	Woodworking machinery same as source WM-4 above.	2005	11,736 lb/hr PWR	DC-6
S1	BV1	Wood Dust Silo # 1	1987	1,270 cfm	BV-1
S2	BV-2	Wood Dust Silo # 2	1998	1,270 cfm	BV-2
Line-1	Fugitive Inside Building Multiple Vent pints	Automatic Spray Finishing Line No. 1	1987	14,755 lb/hr PWR	VEN 1
Line-2	Fugitive Inside Building Multiple Vent pints	Automatic Spray Finishing Line No. 2	1987	14,755 lb/hr PWR	VEN 1
Line-4	Fugitive Inside Building Multiple Vent pints	Rollcoat Finishing Line No. 4	1995	5,171 lb/hr PWR	
F1	F1	Manual Spray Booth	1987	5,218 lb/hr PWR	F1
F2	F2	Manual Spray Booth	1987	5,218 lb/hr PWR	F2
F3	F3	Manual Spray Booth	1997	630 lb/hr PWR	F3

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
B1	Boiler # 1 (Wood Fired)	BC-1

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Wood fired boiler with Multicolne Mechanical collector with minimum design efficiency of 80% for collection of particulate.

Manufacturer:	**Model number:**	**Serial number:**
Hurst Boiler & Welding Co.	Model H-1950-150 WF	

Construction date:	**Installation date:**	**Modification date(s):**
11/14/1986	11/14/1986	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
13.3 MMBtu/hr

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
1,900 lb/hr	8,322 TPY	24 hrs / 7 days week / 365 days year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? __x_Yes ___ No	**If yes, is it?** _x__ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: 13.3 MMBtu/hr	**Type and Btu/hr rating of burners:** 13.3 MMBtu/hr

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Wood Waste

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Wood Waste		5.2 %	7,000

Emissions Data			
Criteria Pollutants	Potential Emissions		
	PPH	TPY	
Carbon Monoxide (CO)	8.6	38	
Nitrogen Oxides (NO_X)	8.2	36	
Lead (Pb)			
Particulate Matter ($PM_{2.5}$)			
Particulate Matter (PM_{10})			
Total Particulate Matter (TSP)	3.4	15	
Sulfur Dioxide (SO_2)	8.6	38	
Volatile Organic Compounds (VOC)	3.8	17	
Hazardous Air Pollutants	Potential Emissions		
	PPH	TPY	
Regulated Pollutants other than Criteria and HAP	Potential Emissions		
	PPH	TPY	

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

BOILER CALCULATIONS:

The 300 hp boiler produces 10,350 pounds per hour of steam. Assuming a boiler efficiency of 78% and and a wood heat content of 7000 BTU per pound, the maximum design heat input and fuel usage burning 100% wood would be approximately:

[10,350 lb. steam/hr]*1000 BTU/lb. steam] *[1/78% efficiency] = 13.3 million BTU/hr

The maximum amount of fuel (wood) fired per hour will be approximately:

[13.3 million BTU/hr]*[lb. wood/7000 BTU]
= 1,900 lb. wood/hr. = 0.95 tons wood/hr.

Therefore calculations are based on the fuel rate and emission factors.

NOTES:
(1) From AP-42, U.S.E.P.A. with Supplement No. 14(A), and 'Stack emission Standards for Industrial Wood-Fired Boilers', October 1984, Coneg Policy Research Center, Inc., Washington, D.C.(B)

(2) Adjusted upward to account for higher nitrogen content in maple wood which could approach double that of the average. See reference B above.

(3) Based on average of three underfeed stocker boilers as noted in reference B above.

(4) Conservative estimate. The factor in Supplement 14 of reference A above is 0.15 lb/ton.

(5) The data point of 4.9 lb/ton is an excursion at an underfeed stoker boiler. The average for such boilers is 1.4 lb/ton. A conservative figure was used.

(6) The AP-42 factor in Supplement 14 for wood (uncontrolled) was used.

The emission rates for SO2, NOx, CO, and VOC will be controlled by good boiler design and good operating practice. Particulate emissions will be controlled by a muliclone.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

The 45CSR10 SO2 emission limit for the B1 boiler wood is streamlined by demonstrating compliance with the 8.6 lb/hr SO2 limit established by 45CSR14 in Permit No. R14-0002 (Condition A.4.) and thus this Title V Standard Limitation, 4.1.1. The sulfur dioxide emission limit for the 13.3 MMBtu/hr boiler (emission point B1) is defined by 45CSR10 as 42.56 lbs SO2/hr.
Compliance with the particulate weight standard of 3.32 (lb PM/hr) (45CSR§2-4.1.c) incorporated by the Title V permit as Standard Limitation 4.1.11. shall streamline compliance with the 3.4 (lb/hr) PM requirement of 45CSR14, Permit No. R14-0002, (condition A.4.), and thus the PM requirements of Standard Limitation 4.1.1. Therefore, compliance with Standard Limitation 4.1.11. of this Title V permit will assure compliance with the applicable weight rate standard of 45CSR2.
[45CSR14, Permit No. R14-0002 - (condition A.4.), Equipment ID (B1)]

4.1.6. Pursuant to 45CSR2, Section 3.1, the emission of smoke and/or particulate matter into the open air from the Hurst Boiler & Welding Co., Model H-1950-150 WF, 14.4 MMBtu/hr and 13.3 MMBtu/hr boilers, designated as B3 and B1 respectively shall not exceed, in shade or appearance, ten (10) percent opacity.
[45CSR13, Permit No. R13-2220BD - (condition A.4.1.6.), Equipment ID (B3)]
[45CSR§2-3.1, Emission Point IDs (B3 and B1)]

4.1.11. The 13.3 MMBtu/hr boiler designated as B1 shall not exceed 3.32 lb/hr of PM.
Compliance with the 45CSR2 PM standard for the B1 boiler utilizing wood waste as defined in 4.1.11. above shall streamline compliance with the 3.4 (lb/hr) PM requirement of 45CSR14, Permit No. R14-0002 (condition A.4.), and thus Standard Limitation 4.1.1. of this permit.
[45CSR§2-4.1, Emission Point ID (B1)]

4.1.12. The visible emission standards set forth in 45CSR§2-3, and thus 4.1.6. of this permit, shall apply at all times except in periods of start-up, shutdown and malfunctions. Where the Director believes that start-ups and shutdowns are excessive in duration and/or frequency, the Director may require an owner or operator to provide a written report demonstrating that such frequent start-ups and shutdowns are necessary.
At all times, including periods of start-ups, shutdowns and malfunctions, owners and operators shall, to the extent practicable, maintain and operate any fuel burning unit(s) including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.
Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, visible emission observations, review of operating and maintenance procedures and inspection of the source.
[45CSR§2-9.1., 45CSR§2-9.2., Equipment ID (B1, B3)]

__x__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

4.2.1. Opacity Compliance checks once per month for Boiler stacks (B1 and B3).
Visual emission checks of each emission point subject to an opacity limit shall be conducted monthly. These checks shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the emission point has visible emissions using procedures outlined in 40 C.F.R. 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40C.F.R.60, Appendix A, Method 9 evaluation within three (3) days unless the permittee can demonstrate a valid reason that the time frame should be extended. A Method 9 evaluation shall not be required if the visible emission condition is corrected within 24 hours and the emission source is operated at normal operating conditions.
[45CSR§30-12.7, Emission Point ID (B1, B3)]

4.2.2. The permittee shall maintain records indicating the operating schedule, quantity of fuel combusted by fuel type, and fuel quality analysis parameters. Records shall be maintained on site for a period of no less than five (5) years. Specific records to be maintained by fuel type are as follows:
Title V Operating Permit R30-03100003-2004 (MM01) Page 25 of 48
American Woodmark Corporation • Hardy County Plant
West Virginia Department of Environmental Protection • Division of Air Quality
Approved: November 1, 2004 • Revised: October 31, 2005
Fuel Type Recordkeeping Parameters
Wood • Date/time of startups and shutdowns.
• Quantity burned per day.
. Ash and BTU analysis
Fuel Oil • Date/time of startups and shutdowns.
• Quantity burned per day.
• BTU analysis for each shipment.
• Sulfur weight percent analysis for each shipment.
[45CSR§30-5.1.c., 45CSR§2-8.3.c., 45CSR§2A-7.1.a., 45CSR2A Boiler Registration (4/3/01), Emission Point IDs (B1, B3)]

4.2.3. The permittee shall maintain monthly summaries of the quantity of each fuel type combusted in the B1 and B3 boilers on a pounds per hour basis, as well as maintain a rolling annual sum of the total quantity combusted during the prior twelve month period.
[45CSR§30-12.7, Emission Point IDs (B1, B3)]
4.2.4 The permittee shall maintain monthly records indicating the emission calculations and results used to demonstrate compliance with all point source emission limits pertaining to boilers B1 and B3. When available, site specific emission factors derived from performance requirements 4.3.2 and 4.3.3. shall be incorporated into the compliance demonstration. Prior to developing site specific emission factors the permittee can opt to use emission factors provided by the boiler manufacturer or current AP-42 factors. Since there are no stack testing provisions for SO2 and VOC these pollutants will continue to demonstrate compliance by utilizing AP-42 factors for small wood fired boilers or emission factors provided by the boiler manufacturer. The Division of Air Quality may specify or may approve other valid methods for compliance determination when deemed appropriate and necessary. These records shall be maintained on site for a period of no less than five (5) years.
[45CSR§30-5.1.c., Emission Point IDs (B1, B3)]
4.2.5. In order to ensure proper operation of the boiler cyclones the permittee shall conduct an annual preventative maintenance inspection/cleaning/refurbishment, as appropriate, of the housing, connections, and dust hoppers pertaining to the multiclones servicing emission points B1 and B3,. Records shall be maintained on site for a period of no less than five (5) years stating the date and time of each multiclone's annual preventative maintenance activity, the results of the annual preventative maintenance activity and, if appropriate, all corrective actions taken.
[45CSR§30-5.1.c., Emission Point IDs. (B1, B3)]

4.2.6. The owner or operator of a fuel burning unit(s) subject to 45CSR2 shall report to the Director any malfunction of such unit or its air pollution control equipment which results in any excess particulate matter emission rate or excess opacity as provided in one of the following subdivisions:

a. Excess opacity periods meeting the following conditions may be reported on a quarterly basis unless otherwise required by the Director:
1. The excess opacity period does not exceed thirty (30) minutes within any 24-hour period; and

2. Excess opacity does not exceed 40%.
b. The owner or operator shall report to the Director any malfunction resulting in excess particulate matter or excess opacity, not meeting the criteria set forth in 4.2.6.a., by telephone, telefax, or email by the end of the next business day after becoming aware of such condition. The owner or operator shall file a certified written report concerning the malfunction with the Director within thirty (30) days providing the following information:
1. A detailed explanation of the factors involved or causes of the malfunction;
2. The date and time of duration (with starting and ending times) of the period of excess emissions;
3. An estimate of the mass of excess emissions discharged during the malfunction period;
4. The maximum opacity measured or observed during the malfunction;
5. Immediate remedial actions taken at the time of the malfunction to correct or mitigate the effects of the malfunction; and
6. A detailed explanation of the corrective measures or program that will be implemented to prevent a recurrence of the malfunction and a schedule for such implementation.
[45CSR§2-9.3, Emission Point IDs. (B1, B3)]

4.2.7. In the event of an unavoidable shortage of fuel having characteristics or specifications necessary for a fuel burning unit to comply with the visible emission standards set forth in 45CSR§2-3. or any emergency situation or condition creating a threat to public safety or welfare, the Director may grant an exception to the otherwise applicable visible emission standards for a period not to exceed fifteen (15) days, provided that visible emissions during the exception period do not exceed a maximum six (6) minute average of thirty (30) percent and that a reasonable demonstration is made by the owner or operator that the emission standards under 45CSR§2-4 will not be exceeded during the exemption period.
[45CSR§2-10.1, Emission Point IDs. (B1, B3)]
4.2.8. Due to unavoidable malfunction of equipment or inadvertent fuel shortages, emissions exceeding those provided for in 45CSR10 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the equipment malfunction or fuel shortage. In cases of major equipment failure or extended shortages of conforming fuels, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.
[45CSR§10-9.1., Emission Point IDs. (B1, B3)]

4.4.1. A record of each visible emission check required by the monitoring requirements of section 4.2.1. above shall be maintained on site for a period of no less than five (5) years. Said record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirements, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR§30-5.1.c., Emission Point IDs. (B1, B3)]

Are you in compliance with all applicable requirements for this emission unit? _x_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
B3	Boiler # 3 (Wood Fired)	BC-3

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Wood waste boiler.

Manufacturer:	**Model number:**	**Serial number:**
Hurst Boiler & Welding Co.	Model H-1950-150 WF	
Construction date:	**Installation date:**	**Modification date(s):**
1998	1998	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
14.4 MMBtu/hr

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
2,060 lb/hr	9,023 TPY	24 hrs / 7 days week / 365 days year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? _x__Yes ___ No	**If yes, is it?** _x__ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: 14.4 MMBtu/hr wood waste – 300 HP	**Type and Btu/hr rating of burners:** 14.4 MMBtu/hr wood waste

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
1) Wood Waste Fuel – 2,060 lb/hr 9,023 TPY
2) # 2 Fuel Oil

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Wood Waste			7,000 btu/lb
# 2 Fuel Oil	0.3 % by weight		115,000 BTU/gal

Emissions Data - When Combusting Wood- # 2 Fuel Oil Emissions in parenthesis			
Criteria Pollutants	Potential Emissions		
	PPH	TPY	
Carbon Monoxide (CO)	14.75 (0.54)	64.61 (2.34)	
Nitrogen Oxides (NO_X)	2.66 (2.14)	10.85 (9.37)	
Lead (Pb)			
Particulate Matter ($PM_{2.5}$)			
Particulate Matter (PM_{10})	2.59 (0.11)	11.35 (0.47)	
Total Particulate Matter (TSP)	3.6 (0.21)	14.25 (0.94)	
Sulfur Dioxide (SO_2)	0.15 (4.56)	0.68 (19.96)	
Volatile Organic Compounds (VOC)	0.23 (0.27)	0.99 (1.17)	
Hazardous Air Pollutants	Potential Emissions		
	PPH	TPY	
Regulated Pollutants other than Criteria and HAP	Potential Emissions		
	PPH	TPY	

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Stack emission limits for wood fuel were calculated from emission testing conducted on April 13, 2005. Testing was conducted by Deeco of Raleigh NC.

Emission calculations for # 2 fuel oil were derived from AP-42 factors.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

4.1.2. The Hurst Boiler & Welding Co., Model H-1950-150 WF, 14.4 MMBtu/hr wood/oil- waste-fired boiler (with an oil-fired backup burner), designated as B3, shall use only wood waste or #2 Fuel Oil as fuel. Alternative fuels may be used only after receiving prior written approval from the Director.
[45CSR13, Permit No. R13-2220BD - (condition A. 4.1.3.), Equipment ID (B3)]

4.1.3. The hourly and annual throughput of wood waste, which includes the as-received moisture, into the Hurst Boiler & Welding Co., Model H-1950-150 WF, 14.4 MMBtu/hr wood waste-fired boiler, designated as B3, shall not exceed 2,060 pounds per hour or 9,023 tons per year, respectively. Compliance with the wood waste throughput limit shall be determined using a rolling yearly total. A rolling yearly total shall mean the sum of the throughput at any given time for the previous twelve (12) consecutive months.
[45CSR13, Permit No. R13-2220BD - (condition A.4.1.1.), Equipment ID (B3)]

4.1.4. The hourly and annual throughput of #2 Fuel Oil into the Hurst Boiler & Welding Co., Model H-1950-150 WF, 14.4 MMBtu/hr oil-fired back-up burner, designated as B3, shall not exceed 107 gallons per hour nor 937,320 gallons per year, respectively. Compliance with the #2 Fuel Oil throughput limit shall be determined using a rolling yearly total.
[45CSR13, Permit No. R13-2220BD - (condition A.4.1.2.), Equipment ID (B3)]
4.1.5. No.2 Fuel Oil burned in the boiler designated as B3 shall not contain greater than 0.3 weight percent sulfur. The owner or operator shall, pursuant to 40 CFR 60, Subpart Dc, Sections 60.48c(e) and (f), submit a certified report from the fuel supplier that shows compliance with this requirement.
Compliance with the R13-2220BD - (condition A.4.1.5.) 0.3 weight percent sulfur standard for the B3 boiler burning No. 2 Fuel Oil is streamlined with the 0.5 weight percent sulfur standard for No.2 Fuel Oil of NSPS Subpart Dc 60.42c(d). Therefore, compliance with the permit limit will also assure compliance with the applicable weight percent sulfur standard for No.2 Fuel Oil of NSPS Subpart Dc.
[45CSR13, Permit No. R13-2220BD - (condition A.4.1.5.), Equipment ID (B3)]

4.1.6. Pursuant to 45CSR2, Section 3.1, the emission of smoke and/or particulate matter into the open air from the Hurst Boiler & Welding Co., Model H-1950-150 WF, 14.4 MMBtu/hr and 13.3 MMBtu/hr boilers, designated as B3 and B1 respectively shall not exceed, in shade or appearance, ten (10) percent opacity.
[45CSR13, Permit No. R13-2220BD - (condition A.4.1.6.), Equipment ID (B3)]
[45CSR§2-3.1, Emission Point IDs (B3 and B1)]
4.1.7. The Hurst Boiler & Welding Co., Model H-1950-150 WF, 14.4 MMBtu/hr wood waste-fired boiler (B3), shall be equipped with a multiclone mechanical collector, identified as DB3, for control of particulate matter emissions. Exhaust from the boiler shall at all times be routed through the multiclone. The multiclone shall be installed, maintained, and operated so as to achieve a minimum design efficiency of 80% in the collection of particulate matter.
[45CSR13, Permit No. R13-2220BD - (condition A.4.1.7.), Equipment ID (B3)]

Compliance with the 45CSR2 PM standard for the B3 boiler burning wood waste fuel is defined in 45CSR§2.4.1.c. as 3.6 (lb/hr) PM is streamlined with the 2.88 (lb/hr) PM requirement of 45CSR13, Permit No. R13-2220BD (condition A.4.1.9.), and thus Standard Limitation 4.1.8. of the Title V Permit pertaining to Boiler ID (B3). Therefore, compliance with the permit limit will also assure compliance with the applicable particulate matter standard of 45CSR2.
The 45CSR10 SO2 emission limit for the boiler designated as B3 is streamlined by demonstrating compliance with the 0.15 lb/hr SO2 emission limit established by 45CSR13, in Permit No. R13-2220BD (Condition A.4.1.9.) for burning wood waste. The 14.4 MM Btu/hr boiler (emission point B3) was found to be subject to a 45CSR10 individual stack specific SO2 emission limit of 46.08 lb/hr SO2.
[45CSR13, Permit No. R13-2220BD - (condition A.4.1.9.), Equipment ID (B3)]

Compliance with the 45CSR2 PM standard for the B3 boiler burning #2 fuel oil is defined in 45CSR§2.4.1.b. as 1.30 (lb/hr) PM is streamlined with the 0.21 (lb/hr) PM requirement of 45CSR13, Permit No. R13-2220BD - (condition A.4.1.10.), and thus Standard Limitation 4.1.9 of the Title V Permit pertaining to Boiler ID (B3)**.** Therefore, compliance with the permit limit will also assure compliance with the applicable particulate matter standard of 45CSR2.
The 14.4 MM Btu/hr boiler (emission point B3) has an individual stack specific SO2 emission limit of 46.08

lb/hr SO2 according to 45CSR10. The 45CSR10 SO2 emission limit for the B3 boiler is streamlined by demonstrating compliance with the 4.56 lb/hr SO2 emission limit established by 45CSR13, in Permit No. R13-2220BD (Condition A.4.1.10) pertaining to burning #2 fuel oil.
[45CSR13, Permit No. R13-2220BD - (condition A.4.1.10.), Equipment ID (B3)]

4.1.12. The visible emission standards set forth in 45CSR§2-3, and thus 4.1.6. of this permit, shall apply at all times except in periods of start-up, shutdown and malfunctions. Where the Director believes that start-ups and shutdowns are excessive in duration and/or frequency, the Director may require an owner or operator to provide a written report demonstrating that such frequent start-ups and shutdowns are necessary.
At all times, including periods of start-ups, shutdowns and malfunctions, owners and operators shall, to the extent practicable, maintain and operate any fuel burning unit(s) including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.
Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, visible emission observations, review of operating and maintenance procedures and inspection of the source.
[45CSR§2-9.1., 45CSR§2-9.2., Equipment ID (B1, B3)]

x Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

4.2.1. Opacity Compliance checks once per month for Boiler stacks (B1 and B3).
Visual emission checks of each emission point subject to an opacity limit shall be conducted monthly. These checks shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the emission point has visible emissions using procedures outlined in 40 C.F.R. 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40C.F.R.60, Appendix A, Method 9 evaluation within three (3) days unless the permittee can demonstrate a valid reason that the time frame should be extended. A Method 9 evaluation shall not be required if the visible emission condition is corrected within 24 hours and the emission source is operated at normal operating conditions.
[45CSR§30-12.7, Emission Point ID (B1, B3)]

4.2.2. The permittee shall maintain records indicating the operating schedule, quantity of fuel combusted by fuel type, and fuel quality analysis parameters. Records shall be maintained on site for a period of no less than five (5) years. Specific records to be maintained by fuel type are as follows:

Wood • Date/time of startups and shutdowns.
• Quantity burned per day.
. Ash and BTU analysis
Fuel Oil • Date/time of startups and shutdowns.
• Quantity burned per day.
• BTU analysis for each shipment.
• Sulfur weight percent analysis for each shipment.
[45CSR§30-5.1.c., 45CSR§2-8.3.c., 45CSR§2A-7.1.a., 45CSR2A Boiler Registration (4/3/01), Emission Point IDs (B1, B3)]

4.2.3. The permittee shall maintain monthly summaries of the quantity of each fuel type combusted in the B1 and B3 boilers on a pounds per hour basis, as well as maintain a rolling annual sum of the total quantity combusted during the prior twelve month period.
[45CSR§30-12.7, Emission Point IDs (B1, B3)]

4.2.4 The permittee shall maintain monthly records indicating the emission calculations and results used to demonstrate compliance with all point source emission limits pertaining to boilers B1 and B3. When available, site specific emission factors derived from performance requirements 4.3.2 and 4.3.3. shall be incorporated into the compliance demonstration. Prior to developing site specific emission factors the permittee can opt to use emission factors provided by the boiler manufacturer or current AP-42 factors. Since there are no stack testing provisions for SO2 and VOC these pollutants will continue to demonstrate compliance by utilizing AP-42 factors for small wood fired boilers or emission factors provided by the boiler manufacturer. The Division of Air Quality may specify or may approve other valid methods for compliance determination when deemed

appropriate and necessary. These records shall be maintained on site for a period of no less than five (5) years.
[45CSR§30-5.1.c., Emission Point IDs (B1, B3)]
4.2.5. In order to ensure proper operation of the boiler cyclones the permittee shall conduct an annual preventative maintenance inspection/cleaning/refurbishment, as appropriate, of the housing, connections, and dust hoppers pertaining to the multiclones servicing emission points B1 and B3,. Records shall be maintained on site for a period of no less than five (5) years stating the date and time of each multiclone's annual preventative maintenance activity, the results of the annual preventative maintenance activity and, if appropriate, all corrective actions taken.
[45CSR§30-5.1.c., Emission Point IDs. (B1, B3)]

4.2.6. The owner or operator of a fuel burning unit(s) subject to 45CSR2 shall report to the Director any malfunction of such unit or its air pollution control equipment which results in any excess particulate matter emission rate or excess opacity as provided in one of the following subdivisions:

a. Excess opacity periods meeting the following conditions may be reported on a quarterly basis unless otherwise required by the Director:
1. The excess opacity period does not exceed thirty (30) minutes within any 24-hour period; and
2. Excess opacity does not exceed 40%.
b. The owner or operator shall report to the Director any malfunction resulting in excess particulate matter or excess opacity, not meeting the criteria set forth in 4.2.6.a., by telephone, telefax, or email by the end of the next business day after becoming aware of such condition. The owner or operator shall file a certified written report concerning the malfunction with the Director within thirty (30) days providing the following information:
1. A detailed explanation of the factors involved or causes of the malfunction;
2. The date and time of duration (with starting and ending times) of the period of excess emissions;
3. An estimate of the mass of excess emissions discharged during the malfunction period;
4. The maximum opacity measured or observed during the malfunction;
5. Immediate remedial actions taken at the time of the malfunction to correct or mitigate the effects of the malfunction; and
6. A detailed explanation of the corrective measures or program that will be implemented to prevent a recurrence of the malfunction and a schedule for such implementation.
[45CSR§2-9.3, Emission Point IDs. (B1, B3)]

4.2.7. In the event of an unavoidable shortage of fuel having characteristics or specifications necessary for a fuel burning unit to comply with the visible emission standards set forth in 45CSR§2-3. or any emergency situation or condition creating a threat to public safety or welfare, the Director may grant an exception to the otherwise applicable visible emission standards for a period not to exceed fifteen (15) days, provided that visible emissions during the exception period do not exceed a maximum six (6) minute average of thirty (30) percent and that a reasonable demonstration is made by the owner or operator that the emission standards under 45CSR§2-4 will not be exceeded during the exemption period.
[45CSR§2-10.1, Emission Point IDs. (B1, B3)]
4.2.8. Due to unavoidable malfunction of equipment or inadvertent fuel shortages, emissions exceeding those provided for in 45CSR10 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the equipment malfunction or fuel shortage. In cases of major equipment failure or extended shortages of conforming fuels, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.
[45CSR§10-9.1., Emission Point IDs. (B1, B3)]

4.4.1. A record of each visible emission check required by the monitoring requirements of section 4.2.1. above shall be maintained on site for a period of no less than five (5) years. Said record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirements, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR§30-5.1.c., Emission Point IDs. (B1, B3)]
4.4.2 For the purposes of determining compliance with maximum throughput limits set forth by the **limitations and standards sections 4.1.3** and **4.1.4** American Woodmark Corporation shall maintain daily records which are to be summarized into monthly reports. Such records shall be retained by the permittee for at least five (5) years. Certified records shall be made available to the Director or his/her duly authorized representative upon request.
[45CSR13, Permit No. R13-2220BD - (condition B.10.4.4.4.), Equipment ID (B3)]

4.5.1. The permittee shall obtain a certified report from the fuel supplier for each fuel shipment that shows the #2 Fuel Oil used to fire the B3 boiler does not contain greater than 0.3 weight percent sulfur. A semi-annual report that

includes a copy of each certified report from the fuel supplier shall be submitted to the Director and to USEPA.
[40 C.F.R. 60, Subpart Dc, Sections 60.42c(h)(1) and 60.48c(d)- 60.48c(f)(1), 60.48c(j), Equipment ID(B3)]

Are you in compliance with all applicable requirements for this emission unit? ___Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
F3	Manual Spray booth F3	F3

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Manual spray booth for the purpose of applying finishing materials to wood cabinet components.

Manufacturer:	**Model number:**	**Serial number:**

Construction date:	**Installation date:**	**Modification date(s):**
1997	1997	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 630 lb/hr PWR

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
630 lb/hr PWR	5,518,800 PWR	24 hrs / 7 days week / 365 days year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes __x_ No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data			
Criteria Pollutants	Potential Emissions		
	PPH	TPY	
Carbon Monoxide (CO)			
Nitrogen Oxides (NO_X)			
Lead (Pb)			
Particulate Matter ($PM_{2.5}$)			
Particulate Matter (PM_{10})			
Total Particulate Matter (TSP)	1.0	0.5	
Sulfur Dioxide (SO_2)			
Volatile Organic Compounds (VOC)	4.61	9.58	
Hazardous Air Pollutants	Potential Emissions		
	PPH	TPY	
Total HAPs	1.24	2.57	
Formaldehyde	No limit	0.50	
Regulated Pollutants other than Criteria and HAP	Potential Emissions		
	PPH	TPY	

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Product usage was determined from production and engineering calculations.

Emission calculations for VOC and VHAP emissions assume 100 % of this content as applied goes to the atmosphere.

PM emissions are calculated from product usage using a factor of 50% transfer efficiency and 90% efficiency of particulate matter emissions.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

b. All spray guns shall be operated and maintained so as to achieve a minimum 50.0% transfer efficiency in the application of surface coating onto any substrate.

c. The spray booths shall be designed, operated, and maintained with adequate negative pressure so as to capture 100.0% of over spray from the application of the surface coatings.
d. Mat filters shall be installed, maintained, and operated so as to achieve a minimum efficiency of 90.0% in the control of particulate matter emissions.
e. At least monthly, visual inspections of the spray guns, paint booths, and mat filters shall be made so as to ensure the achievement of the minimum transfer/capture/control efficiencies required above. The visual inspection shall be conducted so as to find any defect or deterioration in quality of the spray guns, paint booths, and mat filters that would cause or contribute to a reduction of the transfer/capture/control efficiency to below the minimums required in this section. Upon detection of a defect or a deterioration in quality of any of the equipment, repair or replacement of the affected equipment shall take place prior to any further surface coating operations that utilize said affected equipment. A record of each visual inspection required above shall be maintained on site for a period of no less than five (5) years. Said record shall include, but not be limited to, the date, time, listing of equipment checked, the results of the check, what action(s), if any, was/were taken, and the name of the observer.

1. The permittee shall notify the Director in writing of the surface coating/thinner to be used and the HAP(s) contained therein within thirty (30) days of the use of the surface coating. Additionally, a MSDS sheet for the surface coating shall be supplied at this time to the Director.
2. The use of the surface coating/thinner shall be incorporated into the record keeping requirements contained herein and contribute to the individual and aggregate HAP emission rate as limited herein by 7.1.6.a. and recorded in accordance with 7.2.5 of this permit.

3. The use of any surface coating/thinner containing any toxic air pollutant (TAP), as defined by West Virginia Legislative Rule 45CSR27, Section 2.10, that results in an increase in TAP emissions over the threshold described in 45CSR13, Section 2.17(c), is prohibited prior to receiving a modification to this permit for the use of the specified surface coatings.
g. Operation of the manual spray booth shall be in accordance with all applicable requirements contained in 40 C.F.R. 63, Subpart JJ and thus, Section 6 of this Title V Permit.
[45CSR13, Permit No. R13-2220BD, Condition (A.4.1.11.), Equipment ID (F3)]
7.1.7. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity.
[45CSR§7-3.1, Equipment IDs (Line-1, Line-2 and Spray Booths F1, F2, and F3)]

__x__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

7.2.1. Compliance with provisions 7.1.1 and 7.1.2 of this permit shall be demonstrated by maintaining daily recordkeeping on finishing Line-1 and Line-2 as well as Spray Booths F1 and F2. The following information must be recorded daily for Line-1, Line-2 and Spray Booths F1 and F2:
* Hours of actual finishing operation.
* Identity and total quantity, in gallons, of each stain, sealer, topcoat and solvent used on the finishing lines and spray booths.
The hourly particulate matter and VOC emission rates for each finishing line or spray booth shall be determined as follows, where the VOC and particulate losses from all stains, sealers, topcoats, and solvents are summed:
lb/hr VOC = (Qi * Vi)/t
lb/hr PM = ((1-CE) * (1-TE) * Qi * Si) / t

Where,
Qi = Gallons of coating (i) or solvent (i) used on the line or spray booth during the operating day
Vi = VOC content of coating (i) or solvent (i), in lbm/gallon of coating or solvent
t = Hours of operation for the coating line or spray booth during the specific day.
CE = Particulate fractional control efficiency for the spray cabinets or booths.
TE = Solids fractional transfer efficiency for the finish line or spray booth
Si = Solids content of coating (i) or solvent (i), in lbm/gallon of coating or solvent.
A calender quarterly report shall be submitted to the WVDAQ which contains a summary of all the daily emission determinations, summary total of VOC and particulate matter emissions from the finishing operations during the quarter, (tons for period), and the total quantity (in gallons) of each stain, sealer, and topcoat received at the plant during the quarter. This report must be submitted to the WVDAQ no later than the 15th day following the last day of each calendar quarter.
[45CSR14, Permit No. R14-0002, condition (B.4.), - Equipment ID (Line-1, Line-2, F1, F2)]

Are you in compliance with all applicable requirements for this emission unit? _x_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
Line 1 & 2 F1 & F2	Automatic Spray Finishing Line 1 & 2 plus F1 and F2 Spray Booths	Ven 1 – Ven 2- F1 – F2

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Automatic spray finishing lines utilizing enclosed water wash-air-assist automatic spray machines. This line also includes 2 manual spray booths. These spray operations have a combined aggregate emission limit for PM and VOC.

Manufacturer:	**Model number:**	**Serial number:**
Venjakob		

Construction date:	**Installation date:**	**Modification date(s):**
11/14/1986	11/14 /1986	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 14,755 lb/hr PWR

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
14,755 lb/hr PWR		24 hrs / 6 days week / 50 week a year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes _x__ No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)	3.56	12.8
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)	700	2,520
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Total HAPs		
Formaldehyde	No limit	0.50
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

The maximum projected VOC and particulate emissions rates for the finishing lines are:

Maximum operating rates based on projected coatings and solvents usage were used to determine the emission rates.

Solvents and solids composition of finishing materials taken from product data sheets were used to determine the emission rate.

A worst case assumption that all VOC contained in the finishing material will be emitted to the atmosphere was used to determine the VOC emission rate.

Particulate emission estimates were based on 14,400 hours of finishing line operations.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

6.1.1. The finishing operations, which includes as applied coatings and thinner usage encompassed by all wood furniture manufacturing operations shall limit VHAP emissions by achieving a weighted average VHAP content across all coatings and thinners no greater than (1 lb VHAP / lb Solids).
[45CSR34, 40 C.F.R. §63.802(a)(1), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
6.1.2. Spray booth cleaning methods shall limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 lb VOC/ lb Solid, as applied.
[45CSR34, 40 C.F.R. §63.802(a)(3),Equipment ID (Spray Booths F1, F2, and F3)]
6.1.3. Contact adhesives used in the wood furniture manufacturing operations shall limit VHAP emissions by achieving a VHAP limit not to exceed 1.0 lb VHAP / lb Solids, as applied.
[45CSR34, 40 C.F.R. §63.802(a)(2)(ii), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
6.1.4. American Woodmark Corporation shall maintain a work practice implementation plan in accordance with the monitoring and compliance procedures specified in 6.2.4 and thus 40 C.F.R. § 63.803.
[45CSR34, 40 C.F.R. §63.803 (a), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

7.1. Limitations and Standards

7.1.1. Particulate matter (PM) and volatile organic compound (VOC) emissions from finishing Line-1, Line-2, and spray booths F1 and F2 shall not exceed 3.56 **lb/hr** PM and 700 **lb/h**r VOC. Since the 45CSR§7-4.1 PM limit of each individual line or spray booth is greater than the aggregate limit specified herein, compliance with this requirement also satisfies compliance with 45CSR§7-4.1
[45CSR§7-4.1, 45CSR14, Permit No. R14-0002, condition (A.1.), Equipment ID (Line-1, Line-2, and Spray Booths F1 and F2)]
7.1.2 Total particulate matter (PM) and volatile organic compound (VOC) emissions from finishing Line-1, Line-2, and spray booths F1 and F2 shall not exceed 12.8 **tons/y**r PM and 2,520 **tons/yr** VOC.
[45CSR14, Permit No. R14-0002, condition (A.2.), Equipment ID (Line-1, Line-2, and Spray Booths F1 and F2)]
7.1.3. Total emissions of volatile organic compounds (VOC) from the UV coating finishing line, designated as Line-4, shall not exceed 10.8 pounds per hour nor 38.9 tons per year.
[45CSR13, Permit No. R13-1829A, condition (A.1.), Equipment ID (Line-4)]
7.1.4. Total emissions of aggregate hazardous air pollutants (HAPs) for the UV coating/finishing line, designated as Line-4, shall not exceed 1.5 pounds per hour nor 2 tons per year.
[45CSR13, Permit No. R13-1829A, condition (A.2.), Equipment ID (Line-4)]

____x Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

6.2.1. American Woodmark Corporation (AWC) shall comply with the average VHAP content standard established in 6.1.1. [and thus, 40 C.F.R. §63.802 (a)(1)] by using the following method:

a. Calculate the average VHAP content for all finishing materials used at the facility using equation 1 and maintain a value of E no greater than 1.0;

Equation 1.

E = (Mc1 Cc1 + Mc2 Cc2 + * * * + Mcn Ccn + S1 W1 + S2 W2 + * * Sn Wn) / (Mc1 + Mc2 + * * * + Mcn)

[45CSR34, 40 C.F.R. §63.804(a)(1), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.2.2. AWC. shall comply with the standards established in 6.1.3. for contact adhesives by using compliant contact adhesives with a VHAP content no greater than 1 lb VHAP / lb Solid, as applied.

[45CSR34, 40 C.F.R. §63.804(c)(1), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

a. AWC shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by 40 C.F.R. §63.807(c) (6.5.2 of this permit)

1. The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources. An affected source is in violation of the standard if E is greater than 1.0 for any month. A violation of the monthly average is a separate violation of the standard for each day of peration, in which the 1.0 average is exceeded during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.
2. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

[45CSR34, 40 C.F.R. §63.804 (g) (1), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

b. AWC operates an affected source subject to the provisions of 40 C.F.R. §63.802 (a)(2)(ii) established in emission standard 6.1.3. of this permit. The affected source complying with this standard through the procedures listed in 40 C.F.R. §63.804(c)(1), and thus defined by 6.2.2. of this permit shall submit a compliance certification with the semiannual report required by 40 C.F.R. §63.807(c). (6.5.2 of this permit).

1. The compliance certification shall state that compliant contact and /or foam adhesives have been used each day in the semiannual reporting period, or should other wise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.
2. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

[45CSR34, 40 C.F.R. §63.804 (g)(5), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

c. The permittee shall submit a compliance certification with the semiannual report required by 40C.F.R.§ 63.807(c), (6.5.2. of this permit).

1. The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a non compliant strippable booth coating is used is a single violation of the standard.
2. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

[45CSR34, 40 C.F.R. §63.804 (g)(7), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

d. AWC operates an affected source subject to the work practice standards defined in 40 C.F.R. §63.803 as specified by requirement 6.1.4 of this permit. Therefore AWC shall submit a compliance certification

containing the following information with the semiannual report required by 40 C.F.R. §63.807(c), (6.5.2of this permit):

1. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.
2. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

[45CSR34, 40 C.F.R. §63.804 (g)(8), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths

F1, F2, and F3)]

6.2.4. American Woodmark Corporation (AWC) shall comply with the work practice standards required by the Wood Furniture MACT 40C.F.R.§63.803 and thus Standard Limitation 6.1.4 in accordance with the following guidelines:

a. AWC shall maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in 6.2.4.b. - 6.2.4.l. listed below. The written work practice implementation plan shall be available for inspection by the Administrator or Director upon request. If the Administrator or Director determines that the work practice implementation plan does not adequately address each of the topics specified by this section or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator or Director may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the sources Title V permit.

[40 C.F.R. §63.803(a), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

b. *Operator training course.* The permittee shall train all new personnel, those hired after November 21, 1997, upon hiring. All existing personnel, those hired before November 21, 1997, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

1. A list of all current personnel by name and job description that are required to be trained;
2. An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
3. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and wash off procedures, appropriate equipment setup and adjustment to minimize finishing material usage and over spray, and appropriate management of cleanup wastes; and
4. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

[40 C.F.R. §63.803(b), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

c. *Inspection and maintenance plan.* Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

1. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
2. An inspection schedule;
3. Methods for documenting the date and results of each inspection and any repairs that were made;
4. The time frame between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

i. A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and

ii. Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

[40 C.F.R. §63.803(c), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

d. *Cleaning and wash off solvent accounting system.* Each owner or operator of an affected source shall develop an organic HAP solvent accounting form to record:

1. The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined by 40 C.F.R. §63.801 as follows*: Organic HAP solvent* means a HAP that is a volatile organic liquid used for dissolving or dispersing constituents in a coating or contact adhesive, adjusting the viscosity of a coating or contact adhesive, or cleaning equipment. When used in a coating or contact adhesive, the organic HAP solvent evaporates during drying and does not become a part of the dried film. ;
2. The number of pieces washed off, and the reason for the washoff; and
3. The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

[40 C.F.R. §63.803(d), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

e. *Chemical composition of cleaning and washoff solvents.* Each owner or operator of an affected source shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to 40C.F.R.63 Subpart JJ, in concentrations subject to MSDS reporting as required by OSHA.

[40 C.F.R. §63.803(e), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

f. *Spray booth cleaning.* Each owner or operator of an affected source shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective

material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.
[40 C.F.R. §63.803(f), Equipment ID (Spray Booths F1, F2, and F3)]
g. *Storage requirements.* Each owner or operator of an affected source shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

[40 C.F.R. §63.803(g), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
h. *Application equipment requirements.* Each owner or operator of an affected source shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
1. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
2. For touch up and repair under the following conditions:

i. The touch up and repair occurs after completion of the finishing operation; or
ii. The touch up and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touch up and repair are applied from a container that has a volume of no more than 2.0 gallons.
3. When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
4. When emissions from the finishing application station are directed to a control device;
5. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
6. The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology.
The affected source shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:
1. The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
2. The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in

the stain.
[40 C.F.R. §63.803(h), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
i. *Line cleaning.* Each owner or operator of an affected source shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.
[40 C.F.R. §63.803(i), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
j. *Gun cleaning.* Each owner or operator of an affected source shall collect all organic HAP solvent used to clean spray guns into a normally closed container.
[40 C.F.R. §63.803(j), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
k. *Wash off operations.* Each owner or operator of an affected source shall control emissions from wash off operations by:
1. Using normally closed tanks for wash off; and
2. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.
[40 C.F.R. §63.803(k), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
l. *Formulation assessment plan for finishing operations.* Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:
1. Identifies VHAP from the list presented in Table 5 of 40C.F.R.63 Subpart JJ, that are being used in finishing operations by the affected source;
2. Establishes a baseline level of usage by the affected source, for each VHAP identified in paragraph (l)(1) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph (l)(1) of this section. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material,

when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in 40 C.F.R. §63.805(d) or (e).
3. Tracks the annual usage of each VHAP identified in (l)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.
4. If, after November 1998, the annual usage of the VHAP identified in paragraph (l)(1) exceeds its baseline level, then the owner or operator of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

i. The exceedance is no more than 15.0 percent above the baseline level;
ii. Usage of the VHAP is below the de minimis level presented in Table 5 of 40C.F.R.63 Subpart JJ for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in 40 C.F.R. §63.805(d) or (e));
iii. The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or
iv. The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.

5. If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
6. If, after November 1998, an affected source uses a VHAP of potential concern listed in Table 6 of 40C.F.R.63 Subpart JJ for which a baseline level has not been previously established, then the baseline level shall be established as the *de minimis* level provided in that same table for that chemical. The affected source shall track the annual usage of each VHAP of potential concern identified in this paragraph that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the *de minimis* level listed in table 6 of 40C.F.R.63 Subpart JJ for that chemical, then the affected source shall provide an explanation to the permitting authority that documents the reason for the exceedance of the *de minimis* level. If the explanation is not one of those listed in paragraphs (l)(4)(i) through (l)(4)(iv) of this section, the affected source shall follow the procedures in paragraph (l)(5) of this section.

[40 C.F.R. §63.803(l)(1-6), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.4. Recordkeeping Requirements

6.4.1. General Recordkeeping Requirements;
a. The owner or operator of an affected source subject to 40C.F.R.63 Subpart JJ shall fulfill all recordkeeping requirements of 40 C.F.R. §63.10 of Subpart A, according to the applicability criteria in 40 C.F.R. §63.800(d) of Subpart JJ.
[40 C.F.R. §63.806(a), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
1. The owner or operator of an affected source subject to the provisions of part 63 shall maintain files of all information (including all reports and notifications) required by part 63, recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.
[40 C.F.R. §63.10 (b)(1), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
6.4.2. Specific Recordkeeping Requirements;
a. AWC shall maintain records of the following:
1. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limitations in 40 C.F.R. §63.802 and thus section 6.1. of this permit; and
2. The VHAP content in kg VHAP/ kg solids (lb VHAP/ lb solids), as applied, of each finishing material and contact adhesive subject to the emission limit in 40 C.F.R. §63.802 and thus section 6.1. of this permit; and
3. The VOC content, in kg VOC/ kg solids (lb VOC/ lb solids), as applied, of each strippable booth coating subject to the emission limits in 40 C.F.R. §63.802(a)(3), (6.1.2 of this permit).
[40 C.F.R. §63.806 (b)(1,2,&3), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
b. AWC, while following the compliance method in 40 C.F.R. §63.804(a)(1) or (d)(1), (6.2.1. of this permit), shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.
[40 C.F.R. §63.806(c), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
c. With respect to the work practice standards of 40 C.F.R.§63.803, (6.2.4. of this permit),AWC shall

maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but no limited to:
1. Records demonstrating that the operator training program required by 40 C.F.R. §63.803(b), (6.2.4.b of this permit), is in place;
2. Records collected in accordance with the inspection and maintenance plan required by 40 C.F.R. §63.803(c), (6.2.4.c. of this permit);
3. Records associated with the cleaning solvent accounting system required by 40 C.F.R. §63.803(d), (6.2.4.d. of this permit);
4. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by 40 C.F.R. §63.803(h)(5), (6.2.4.h.5. of this permit).
5. Records associated with the formulation assessment plan required by 40 C.F.R. §63.803(l), (6.2.4.l. of this permit); and
6. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

[40 C.F.R. §63.806 (e)(1)-(6), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

d. AWC as a result of being subject to the emission limit in 40 C.F.R. §63.802 and following the compliance provisions of 40 C.F.R. §63.804 (f) (1), (2), (3), (5), (7) and (8) as well as 40 C.F.R. §63.804 (g) (1), (2), (3), (5), (7) and (8) shall maintain records of the compliance certifications submitted in accordance with 40 C.F.R. §63.807(c), (6.5.2. of this permit), for each semiannual period following the compliance data.

[40 C.F.R. §63.806 (h), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

e. AWC shall maintain records of all other information submitted with the compliance status report required by 40 C.F.R. §63.9 (h) and 40 C.F.R. §63.807 (b), and the semiannual reports required by 40 C.F.R. §63.807(c), (6.5.2. of this permit).

[40 C.F.R. §63.806 (I), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

f. AWC shall maintain all records in accordance with the requirements of 40 C.F.R. §63.10(b)(1) as specifically identified in requirement 6.4.1.a.1. of this permit.

[40 C.F.R. §63.806 (j), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.5. Reporting Requirements

6.5.1. AWC shall fulfill all reporting requirements of 40 C.F.R.§63.7 through 40 C.F.R. §63.10 of subpart A (General Provisions) according to the applicability criteria in 40 C.F.R. §63.800(d) of Subpart JJ.

[40 C.F.R. §63.807 (a), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.5.2. With respect to demonstrating compliance in accordance with 40 C.F.R. §63.804 (g)(1), (5), (7), and (8), (6.2.3. of this permit), AWC shall submit a report covering the previous 6 months of wood furniture manufacturing operations:

a. The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.

b. Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.

c. The semiannual reports shall include the information required by 40 C.F.R. §63.804 (g)(1), (5), (7), and (8), (6.2.3. of this permit), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.

d. The frequency of the reports required by 6.5.2. of this permit and thus 40 C.F.R. §63.807(c) of the MACT requirement shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

[40 C.F.R. §63.807(c), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.5.3. The owner or operator of an affected source required to provide a written notification under 40 C.F.R. §63.803 (l)(4), (6.2.4.(l)(4) of this permit), shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

[40 C.F.R. §63.807(e), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

7.2.1. Compliance with provisions 7.1.1 and 7.1.2 of this permit shall be demonstrated by maintaining daily recordkeeping on finishing Line-1 and Line-2 as well as Spray Booths F1 and F2. The following information must be recorded daily for Line-1, Line-2 and Spray Booths F1 and F2:

* Hours of actual finishing operation.
* Identity and total quantity, in gallons, of each stain, sealer, topcoat and solvent used on the finishing lines and spray booths.

The hourly particulate matter and VOC emission rates for each finishing line or spray booth shall be determined as follows, where the VOC and particulate losses from all stains, sealers, topcoats, and solvents are summed:

lb/hr VOC = (Qi * Vi)/t

lb/hr PM = ((1-CE) * (1-TE) * Qi * Si) / t

Where,

Qi = Gallons of coating (i) or solvent (i) used on the line or spray booth during the operating day
Vi = VOC content of coating (i) or solvent (i), in lbm/gallon of coating or solvent
t = Hours of operation for the coating line or spray booth during the specific day.
CE = Particulate fractional control efficiency for the spray cabinets or booths.
TE = Solids fractional transfer efficiency for the finish line or spray booth
Si = Solids content of coating (i) or solvent (i), in lbm/gallon of coating or solvent.
A calender quarterly report shall be submitted to the WVDAQ which contains a summary of all the daily emission determinations, summary total of VOC and particulate matter emissions from the finishing operations during the quarter, (tons for period), and the total quantity (in gallons) of each stain, sealer, and topcoat received at the plant during the quarter. This report must be submitted to the WVDAQ no later than the 15th day following the last day of each calendar quarter.

[45CSR14, Permit No. R14-0002, condition (B.4.), - Equipment ID (Line-1, Line-2, F1, F2)]
7.2.2 Compliance with provision 7.1.3 and 7.1.4. of this permit shall be demonstrated by daily and monthly record keeping with respect to the operation of the UV finishing line designated as Line-4.

a. The following information shall be recorded daily:

Are you in compliance with all applicable requirements for this emission unit? _x_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
L4	Rollcoat Finishing Line # 4	

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Low VOC/VHAP Rollcoat line which utilizes UV activated finishing materials.

Manufacturer:	**Model number:**	**Serial number:**

Construction date:	**Installation date:**	**Modification date(s):**
MM/DD/YYYY	MM/DD/YYYY	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 630 lb/hr PWR

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
5,171 lb/hr PWR		24 hrs / 7 days week / 365 days year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes __x_ No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)	10.8	38.9
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Total HAPs	1.5	2.0
Formaldehyde	No limit	0.50
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

The maximum projected VOC and particulate emissions rates for line 4 are:

Maximum operating rates based on projected coatings and solvents usage were used to determine the emission rates.

Solvents and solids composition of finishing materials taken from product data sheets were used to determine the emission rate.

A worst case assumption that all VOC contained in the finishing material will be emitted to the atmosphere was used to determine the VOC emission rate.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

6.1.1. The finishing operations, which includes as applied coatings and thinner usage encompassed by all wood furniture manufacturing operations shall limit VHAP emissions by achieving a weighted average VHAP content across all coatings and thinners no greater than (1 lb VHAP / lb Solids).
[45CSR34, 40 C.F.R. §63.802(a)(1), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.1.3. Contact adhesives used in the wood furniture manufacturing operations shall limit VHAP emissions by achieving a VHAP limit not to exceed 1.0 lb VHAP / lb Solids, as applied.
[45CSR34, 40 C.F.R. §63.802(a)(2)(ii), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
6.1.4. American Woodmark Corporation shall maintain a work practice implementation plan in accordance with the monitoring and compliance procedures specified in 6.2.4 and thus 40 C.F.R. § 63.803.
[45CSR34, 40 C.F.R. §63.803 (a), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

g. *Storage requirements.* Each owner or operator of an affected source shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
[40 C.F.R. §63.803(g), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

h. *Application equipment requirements.* Each owner or operator of an affected source shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
1. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
2. For touch up and repair under the following conditions:
i. The touch up and repair occurs after completion of the finishing operation; or

ii. The touch up and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touch up and repair are applied from a container that has a volume of no more than 2.0 gallons.
3. When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
4. When emissions from the finishing application station are directed to a control device;
5. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
6. The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology.
The affected source shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:
1. The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
2. The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
[40 C.F.R. §63.803(h), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
i. *Line cleaning.* Each owner or operator of an affected source shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.
[40 C.F.R. §63.803(i), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
j. *Gun cleaning.* Each owner or operator of an affected source shall collect all organic HAP solvent used to

clean spray guns into a normally closed container.
[40 C.F.R. §63.803(j), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

k. *Wash off operations.* Each owner or operator of an affected source shall control emissions from wash off operations by:
1. Using normally closed tanks for wash off; and
2. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.
[40 C.F.R. §63.803(k), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

l. *Formulation assessment plan for finishing operations.* Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:
1. Identifies VHAP from the list presented in Table 5 of 40C.F.R.63 Subpart JJ, that are being used in finishing operations by the affected source;
2. Establishes a baseline level of usage by the affected source, for each VHAP identified in paragraph (l)(1) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph (l)(1) of this section. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in 40 C.F.R. §63.805(d) or (e).
3. Tracks the annual usage of each VHAP identified in (l)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.
4. If, after November 1998, the annual usage of the VHAP identified in paragraph (l)(1) exceeds its baseline level, then the owner or operator of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:
i. The exceedance is no more than 15.0 percent above the baseline level;
ii. Usage of the VHAP is below the de minimis level presented in Table 5 of 40C.F.R.63 Subpart JJ for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in 40 C.F.R. §63.805(d) or (e));
iii. The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or
iv. The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.
5. If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

6. If, after November 1998, an affected source uses a VHAP of potential concern listed in Table 6 of 40C.F.R.63 Subpart JJ for which a baseline level has not been previously established, then the baseline level shall be established as the *de minimis* level provided in that same table for that chemical. The affected source shall track the annual usage of each VHAP of potential concern identified in this paragraph that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the *de minimis* level listed in table 6 of 40C.F.R.63 Subpart JJ for that chemical, then the affected source shall provide an explanation to the permitting authority that documents the reason for the exceedance of the *de minimis* level. If the explanation is not one of those listed in paragraphs (l)(4)(i) through (l)(4)(iv) of this section, the affected source shall follow the procedures in paragraph (l)(5) of this section.
[40 C.F.R. §63.803(l)(1-6), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

7.1.3. Total emissions of volatile organic compounds (VOC) from the UV coating finishing line, designated as Line-4, shall not exceed 10.8 pounds per hour nor 38.9 tons per year.
[45CSR13, Permit No. R13-1829A, condition (A.1.), Equipment ID (Line-4)]
7.1.4. Total emissions of aggregate hazardous air pollutants (HAPs) for the UV coating/finishing line, designated as Line-4, shall not exceed 1.5 pounds per hour nor 2 tons per year.
[45CSR13, Permit No. R13-1829A, condition (A.2.), Equipment ID (Line-4)]

____ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

6.2. Monitoring Requirements

6.2.1. American Woodmark Corporation (AWC) shall comply with the average VHAP content standard established in 6.1.1. [and thus, 40 C.F.R. §63.802 (a)(1)] by using the following method:
a. Calculate the average VHAP content for all finishing materials used at the facility using equation 1 and maintain a value of E no greater than 1.0;
Equation 1.
E = (Mc1 Cc1 + Mc2 Cc2 + * * * + Mcn Ccn + S1 W1 + S2 W2 + * * Sn Wn) / (Mc1 + Mc2 + * * * + Mcn)
[45CSR34, 40 C.F.R. §63.804(a)(1), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
6.2.2. AWC. shall comply with the standards established in 6.1.3. for contact adhesives by using compliant contact adhesives with a VHAP content no greater than 1 lb VHAP / lb Solid, as applied.
[45CSR34, 40 C.F.R. §63.804(c)(1), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

a. AWC shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by 40 C.F.R. §63.807(c) (6.5.2 of this permit)
1. The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources. An affected source is in violation of the standard if E is greater than 1.0 for any month. A violation of the monthly average is a separate violation of the standard for each day of peration, in which the 1.0 average is exceeded during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.
2. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
[45CSR34, 40 C.F.R. §63.804 (g) (1), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
b. AWC operates an affected source subject to the provisions of 40 C.F.R. §63.802 (a)(2)(ii) established in emission standard 6.1.3. of this permit. The affected source complying with this standard through the procedures listed in 40 C.F.R. §63.804(c)(1), and thus defined by 6.2.2. of this permit shall submit a compliance certification with the semiannual report required by 40 C.F.R. §63.807(c). (6.5.2 of this permit).
1. The compliance certification shall state that compliant contact and /or foam adhesives have been used each day in the semiannual reporting period, or should other wise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.
2. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
[45CSR34, 40 C.F.R. §63.804 (g)(5), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths

c. The permittee shall submit a compliance certification with the semiannual report required by 40C.F.R.§ 63.807(c), (6.5.2. of this permit).
1. The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a non compliant strippable booth coating is used is a single violation of the standard.
2. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
[45CSR34, 40 C.F.R. §63.804 (g)(7), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths

d. AWC operates an affected source subject to the work practice standards defined in 40 C.F.R. §63.803 as specified by requirement 6.1.4 of this permit. Therefore AWC shall submit a compliance certification containing the following information with the semiannual report required by 40 C.F.R. §63.807(c), (6.5.2 of this permit)

1. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.
2. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
[45CSR34, 40 C.F.R. §63.804 (g)(8), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
6.2.4. American Woodmark Corporation (AWC) shall comply with the work practice standards required by the Wood Furniture MACT 40C.F.R.§63.803 and thus Standard Limitation 6.1.4 in accordance with the following guidelines:
a. AWC shall maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in 6.2.4.b. - 6.2.4.l. listed below. The written work practice implementation plan shall be available for inspection by the Administrator or Director upon request. If the Administrator or Director determines that the work practice implementation plan does not adequately address each of the topics specified by this section or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator or Director may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the sources Title V permit.
[40 C.F.R. §63.803(a), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

b. *Operator training course.* The permittee shall train all new personnel, those hired after November 21, 1997, upon hiring. All existing personnel, those hired before November 21, 1997, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:
1. A list of all current personnel by name and job description that are required to be trained;
2. An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
3. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and wash off procedures, appropriate equipment setup and adjustment to minimize finishing material usage and over spray, and appropriate management of cleanup wastes; and
4. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
[40 C.F.R. §63.803(b), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
c. *Inspection and maintenance plan.* Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:
1. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;

2. An inspection schedule;
3. Methods for documenting the date and results of each inspection and any repairs that were made;
4. The time frame between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
i. A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
ii. Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking

equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.
[40 C.F.R. §63.803(c), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

d. *Cleaning and wash off solvent accounting system.* Each owner or operator of an affected source shall develop an organic HAP solvent accounting form to record:
1. The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined by 40 C.F.R. §63.801 as follows*: Organic HAP solvent* means a HAP that is a volatile organic liquid used for dissolving or dispersing constituents in a coating or contact adhesive, adjusting the viscosity of a coating or contact adhesive, or cleaning equipment. When used in a coating or contact adhesive, the organic HAP solvent evaporates during drying and does not become a part of the dried film. ;
2. The number of pieces washed off, and the reason for the washoff; and
3. The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
[40 C.F.R. §63.803(d), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
e. *Chemical composition of cleaning and washoff solvents.* Each owner or operator of an affected source shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to 40C.F.R.63 Subpart JJ, in concentrations subject to MSDS reporting as required by OSHA.
[40 C.F.R. §63.803(e), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.4. Recordkeeping Requirements

6.4.1. General Recordkeeping Requirements;
a. The owner or operator of an affected source subject to 40C.F.R.63 Subpart JJ shall fulfill all recordkeeping requirements of 40 C.F.R. §63.10 of Subpart A, according to the applicability criteria in 40 C.F.R. §63.800(d) of Subpart JJ.
[40 C.F.R. §63.806(a), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
1. The owner or operator of an affected source subject to the provisions of part 63 shall maintain files of all information (including all reports and notifications) required by part 63, recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.
[40 C.F.R. §63.10 (b)(1), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.4.2. Specific Recordkeeping Requirements;
a. AWC shall maintain records of the following:
1. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limitations in 40 C.F.R. §63.802 and thus section 6.1. of this permit; and
2. The VHAP content in kg VHAP/ kg solids (lb VHAP/ lb solids), as applied, of each finishing material and contact adhesive subject to the emission limit in 40 C.F.R. §63.802 and thus section 6.1. of this permit; and
3. The VOC content, in kg VOC/ kg solids (lb VOC/ lb solids), as applied, of each strippable booth coating subject to the emission limits in 40 C.F.R. §63.802(a)(3), (6.1.2 of this permit).
[40 C.F.R. §63.806 (b)(1,2,&3), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
b. AWC, while following the compliance method in 40 C.F.R. §63.804(a)(1) or (d)(1), (6.2.1. of this permit), shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.
[40 C.F.R. §63.806(c), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

c. With respect to the work practice standards of 40 C.F.R.§63.803, (6.2.4. of this permit),AWC shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but no limited to:
1. Records demonstrating that the operator training program required by 40 C.F.R. §63.803(b), (6.2.4.b of this permit), is in place;

2. Records collected in accordance with the inspection and maintenance plan required by 40 C.F.R. §63.803(c), (6.2.4.c. of this permit);
3. Records associated with the cleaning solvent accounting system required by 40 C.F.R. §63.803(d), (6.2.4.d. of this permit);
4. Records associated with the limitation on the use of conventional air spray guns showing total finishing

material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by 40 C.F.R. §63.803(h)(5), (6.2.4.h.5. of this permit).
5. Records associated with the formulation assessment plan required by 40 C.F.R. §63.803(l), (6.2.4.l. of this permit); and
6. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
[40 C.F.R. §63.806 (e)(1)-(6), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
d. AWC as a result of being subject to the emission limit in 40 C.F.R. §63.802 and following the compliance provisions of 40 C.F.R. §63.804 (f) (1), (2), (3), (5), (7) and (8) as well as 40 C.F.R. §63.804 (g) (1), (2), (3), (5), (7) and (8) shall maintain records of the compliance certifications submitted in accordance with 40 C.F.R. §63.807(c), (6.5.2. of this permit), for each semiannual period following the compliance data.
[40 C.F.R. §63.806 (h), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]
e. AWC shall maintain records of all other information submitted with the compliance status report required by 40 C.F.R. §63.9 (h) and 40 C.F.R. §63.807 (b), and the semiannual reports required by 40 C.F.R. §63.807(c), (6.5.2. of this permit).
[40 C.F.R. §63.806 (I), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

f. AWC shall maintain all records in accordance with the requirements of 40 C.F.R. §63.10(b)(1) as specifically identified in requirement 6.4.1.a.1. of this permit.
[40 C.F.R. §63.806 (j), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.5. Reporting Requirements

6.5.1. AWC shall fulfill all reporting requirements of 40 C.F.R.§63.7 through 40 C.F.R. §63.10 of subpart A (General Provisions) according to the applicability criteria in 40 C.F.R. §63.800(d) of Subpart JJ.
[40 C.F.R. §63.807 (a), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.5.2. With respect to demonstrating compliance in accordance with 40 C.F.R. §63.804 (g)(1), (5), (7), and (8), (6.2.3. of this permit), AWC shall submit a report covering the previous 6 months of wood furniture manufacturing operations:
a. The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.
b. Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.

c. The semiannual reports shall include the information required by 40 C.F.R. §63.804 (g)(1), (5), (7), and (8), (6.2.3. of this permit), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.
d. The frequency of the reports required by 6.5.2. of this permit and thus 40 C.F.R. §63.807(c) of the MACT requirement shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.
[40 C.F.R. §63.807(c), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.5.3. The owner or operator of an affected source required to provide a written notification under 40 C.F.R. §63.803 (l)(4), (6.2.4.(l)(4) of this permit), shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.
[40 C.F.R. §63.807(e), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

7.2.2 Compliance with provision 7.1.3 and 7.1.4. of this permit shall be demonstrated by daily and monthly record keeping with respect to the operation of the UV finishing line designated as Line-4.
a. The following information shall be recorded daily:
1. Hours of actual finishing operations conducted.
2. Identify, total quantity (gallons), VOC content (pounds per gallon), as well as individual and aggregate HAP content (pounds per gallon) of each stain, sealer, topcoat, solvent or other coating materials applied on the finishing line.
3. Calculated VOC as well as individual and aggregate HAP emissions in pounds per hour based on an average defined by the total number of hours the subject line operated **per day.**
b. The daily operating logs shall be summarized into monthly reports, which shall include the following information:
1. Total hours of actual finishing operations conducted during the month.
2. The type and total quantity of each coating and/or solvent applied during the month.
3. The highest daily value in pounds per hour tabulated during the month for the following constituents: VOC, total HAPs and individual HAP values. The highest values (lb/hr) observed during the month shall be reported with the date in which each value corresponds. If the hourly VOC limit established

by 7.1.3. or 7.1.4. of this permit is exceeded then list all date(s) of such occurrence and the associated daily average, lb/hr VOC, calculated.
4. The permittee shall also calculate and maintain a rolling 12 month total for all regulated pollutant(s). All operating logs and monthly reports shall be maintained on-site for no less than 5 years. These records shall be certified by a responsible official and made available to the Director or his/her authorized representative upon request .
[45CSR13, Permit No. R13-1829A, condition (B.1), Equipment ID (Line-4)]

7.2.3. The following HAPs were identified in permit application R13-1829A as potential material constituents of the surface coatings/thinners utilized by the #4 finishing line:
HAP CAS Number
Acrylic Acid 79-10-7
Benzyl Chloride 100-44-7
Cumene 98-82-8
Dibutyl Phthlate 84-74-2
Ethylene Glycol 107-21-1
Ethylbenzene 100-41-4
Formaldehyde 50-00-0
Hexamethylene-1,6-
diisocyanate
822-06-0
Hydroquinone 123-31-9

Methanol 67-56-1
Methyl Ethyl Ketone 78-93-3
Methyl Isobutyl Ketone 108-10-1
Methyl Methacrylate 80-62-6
Naphthalene 91-20-3
Toluene 108-88-3
Xylene 1330-20-7
Glycol Ethers Group
Chromium Compounds
(PM-HAP)
N/A
Manganese Compounds
(PM-HAP)
N/A
Use of any surface coating/thinner containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP and not listed above shall be in accordance with the following:
a. The permittee shall notify the Director in writing of the surface coating/thinner to be used and the HAP(s) contained therein within thirty (30) days of the use of the surface coating. Additionally, an MSDS sheet for the surface coating shall be supplied at this time to the Director.
b. The use of the surface coating/thinner shall be incorporated into the record keeping requirements of 7.2.2. and contribute to the aggregate HAP emission rate as limited by 7.1.4.
c. The use of any surface coating/thinner containing any air pollutant listed in Table 45-13A of c. The use of any surface coating/thinner containing any air pollutant listed in Table 45-13A of 45CSR13, that results in an increase in TAP emissions over the threshold described in 45CSR13, Section 2.17.c. or 2.17.d., is prohibited prior to receiving a modification to this permit for the use of the specified surface coatings.
[45CSR13, Permit No. R13-1829A, condition (B.2.), Equipment ID (Line-4)]
7.2.4. The number four UV coating/finishing line shall comply with the applicable requirements of 40C.F.R.63 Subpart JJ “Wood Furniture Manufacturing Operations” and thus Section 6.0 of this Title V Pemit.
[45CSR13, Permit No. R13-1829A, condition (B.3.), Equipment ID (Line-4)]

Are you in compliance with all applicable requirements for this emission unit? _x_Yes ___No If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
Wood Working Operations	Wood Working Operations	**Duct Collectors**

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
The wood working operations were included in initial Title V application but, there are not applicable requirements associated with the operations. The emission limits associated with wood working apply to the associated dust collectors instead. Any process information having to do with wood working operations was superfluous to information necessary to calculate the PTE from the dust collectors, and so, is not included in this application.

Manufacturer:	**Model number:**	**Serial number:**

Construction date:	**Installation date:**	**Modification date(s):**
MM/DD/YYYY	MM/DD/YYYY	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes ___ No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

____ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all applicable requirements for this emission unit? ___Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT F - Schedule of Compliance Form

American Woodmark Corporation's Hardy County Plant is in compliance with all applicable requirements.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: DC-1	**List all emission units associated with this control device.** Wood Working Equipment	
Manufacturer: Moldow	**Model number:** 102 MX 324	**Installation date:** 11/14/1986

Type of Air Pollution Control Device:

X Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	99.5%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Closed suction configuration

240 12 ounce polyester bags with a total cloth area of 5,000 to 5,200 ft^2

an air to cloth ratio of 9.6:10.0 scf/min

continuous operation with reverse jet air flow

gas stream of 50,000 ACFM at ambient air temperature

particulate loading of 0.00218 outlet gr/scf.

Is this device subject to the CAM requirements of 40 C.F.R. 64? X Yes ___ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Pressure drop indicator measures the pressure drop across the bags. Gauge is read and recorded daily. Visual observations are made continually and, a record of monthly Method 9 readings is maintained.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: DC-2	**List all emission units associated with this control device.** Wood Working Equipment	
Manufacturer: Muldow	**Model number:** 205 MX 324	**Installation date:** 11/14/1986

Type of Air Pollution Control Device:

X Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	99.5%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Closed suction configuration

552 12 ounce polyester bags

continuous operation with reverse jet air flow

gas stream of 100,000 ACFM at ambient air temperature

stabilized static pressure loss aat 3 in. of water

particulate emission rate at maximum efficiency is 0.00218 gr/scf .

Is this device subject to the CAM requirements of 40 C.F.R. 64? X Yes ___ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Pressure drop indicator measures the pressure drop across the bags. Gauge is read and recorded daily. Visual observations are made continually and, a record of monthly Method 9 readings is maintained.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: DC-4	**List all emission units associated with this control device.** Wood Working Equipment	
Manufacturer: Pneumafil	**Model number:** 13.5-460-12	**Installation date:** 11/14/1986

Type of Air Pollution Control Device:

X Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	99.5%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Closed suction configuration

460 bags

continuous operation with reverse jet air flow

gas stream of 42,636 ACFM at ambient air temperature

stabilized static pressure loss aat 3 in. of water

particulate emission rate at maximum efficiency is 0.00218 gr/scf .

Is this device subject to the CAM requirements of 40 C.F.R. 64? X Yes ___ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Pressure drop indicator measures the pressure drop across the bags. Gauge is read and recorded daily. Visual observations are made continually and, a record of monthly Method 9 readings is maintained.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: DC-5	**List all emission units associated with this control device.** Wood Working Equipment	
Manufacturer: Alanco	**Model number:**	**Installation date:** 1998

Type of Air Pollution Control Device:

X Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	99.5%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Is this device subject to the CAM requirements of 40 C.F.R. 64? X Yes ___ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.
Pressure drop indicator measures the pressure drop across the bags. Gauge is read and recorded daily. Visual observations are made continually and, a record of monthly Method 9 readings is maintained.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: DC-6	**List all emission units associated with this control device.** Paint Side Wood Working Equipment	
Manufacturer: Airlanco	**Model number:** Airlanco Panelized 546 RLP10	**Installation date:** 05/27/2005

Type of Air Pollution Control Device:

X Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	99.5%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Closed suction configuration
546 polyester 6.2 ft x 10 ft bags with a total cloth area of 8,954 ft^2 and a weight of 16 oz/yd^2
an air to cloth ratio of 5.92:1 scf/min
continuous operation with reverse jet air flow
gas stream of 53,000 ACFM at ambient air temperature
powered by a 200 hp fan
pressure drop of 0.5 to 4.0 in. of water
particulate loading of 1.0 inlet and 0.005 outlet gr/scf.

Is this device subject to the CAM requirements of 40 C.F.R. 64? X Yes ___ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.
Pressure drop indicator measures the pressure drop across the bags. Gauge is read and recorded daily. Visual observations are made continually and, a record of monthly Method 9 readings is maintained.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: BC1	**List all emission units associated with this control device.** B1	
Manufacturer: Hurst	**Model number:** 12K-17	**Installation date:** 06/24/1987

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	___ Venturi Scrubber	X Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	80%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes X No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification. PTE for PM without the multi-clone is ~75 TPY.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: BC2	**List all emission units associated with this control device.** B3	
Manufacturer: Hurst	**Model number:** 12K-17	**Installation date:** 08/01/1987

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	___ Venturi Scrubber	X Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	80%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes X No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification. PTE for PM without the multi-clone is ~75 TPY.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: Venjakob#1, #2, #3, #4, #5, #6, #7, #8	**List all emission units associated with this control device.** AS-1, AS-2, AS-3, AS-4, AS-5, AS-6, AS-7, AS-8	
Manufacturer: Venjakob	**Model number:**	**Installation date:** 12/01/1986

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	X Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	98%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes X No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.** 12.8 TPY / 8 spray booths / 0.02 control efficiency = 80 TPY

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Operating parameters for production dictate that the units operate properly or product will be ruined. Operating parameters and conditions are constantly monitored as part of production.

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at http://www.epa.gov/ttn/emc/cam.html

CAM APPLICABILITY DETERMINATION

1) Does the facility have a PSEU (Pollutant-Specific Emissions Unit considered separately with respect to **EACH** regulated air pollutant) that is subject to CAM (40 CFR Part 64), which must be addressed in this CAM plan submittal? To determine applicability, a PSEU must meet **all** of the following criteria (*If No, then the remainder of this form need not be completed*): ☒ YES ☐ NO

a. The PSEU is located at a major source that is required to obtain a Title V permit;

b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is NOT exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
- Stratospheric Ozone Protection Requirements.
- Acid Rain Program Requirements.
- Emission Limitations or Standards for which a WVDEP Division of Air Quality Title V permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
- An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).

c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;

d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND

e. The PSEU is NOT an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit:

☐ RENEWAL APPLICATION. **ALL** PSEUs for which a CAM plan has NOT yet been approved need to be addressed in this CAM plan submittal.

☒ INITIAL APPLICATION (submitted after 4/20/98). **ONLY** large PSEUs (i. e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels) need to be addressed in this CAM plan submittal.

☐ SIGNIFICANT MODIFICATION TO LARGE PSEUs. **ONLY** large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, Only address the appropriate monitoring requirements affected by the significant modification.

3) [a] BACKGROUND DATA AND INFORMATION					
Complete the following table for **all** PSEUs that need to be addressed in this CAM plan submittal. This section is to be used to provide background data and information for each PSEU In order to supplement the submittal requirements specified in 40 CFR §64.4. If additional space is needed, attach and label accordingly.					
PSEU DESIGNATION	DESCRIPTION	POLLUTANT	CONTROL DEVICE	[b] EMISSION LIMITATION or STANDARD	[c] MONITORING REQUIREMENT
NA	Woodworking Equipment	PM10	DC-1	0.93 lb/hr and 3.3 tpy	Daily recording of pressure drop and monthly observations of visible emissions.
EXAMPLE Boiler No. 1	Wood-Fired Boiler	PM	Multiclone	45CSR§2-4.1.c.; 9.0 lb/hr	Monitor pressure drop across multiclone: Weekly inspection of multiclone

[a] If a control device is common to more than one PSEU, one monitoring plan may be submitted for the control device with the affected PSEUs identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a). If a single PSEU is controlled by more than one control device similar in design and operation, one monitoring plan for the applicable control devices may be submitted with the applicable control devices identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a).

[b] Indicate the emission limitation or standard for any applicable requirement that constitutes an emission limitation, emission standard, or standard of performance (as defined in 40 CFR §64.1).

[c] Indicate the monitoring requirements for the PSEU that are required by an applicable regulation or permit condition.

CAM MONITORING APPROACH CRITERIA			
Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for EACH indicator selected for EACH PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. if more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.			
4a) PSEU Designation: **NA**	**4b) Pollutant:** **PM**	**4c) [a] Indicator No. 1:** Pressure drop	**4d) [a] Indicator No. 2:** **Visible Emissions**
5a) GENERAL CRITERIA Describe the MONITORING APPROACH used to measure the indicators:		Read the pressure drop gauge	Method 9
[b] Establish the appropriate INDICATOR RANGE or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:		0.5 to 4.0 inches of water	Less than 10%
5b) PERFORMANCE CRITERIA Provide the SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA, such as detector location, installation specifications, and minimum acceptable accuracy:		Pressure drop from inlet to outlet	According to Method 9
[c] For new or modified monitoring equipment, provide VERIFICATION PROCEDURES, including manufacturer's recommendations, TO CONFIRM THE OPERATIONAL STATUS of the monitoring:		Periodic calibration	Semi Annual certification
Provide QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):		Periodic calibration	Semi Annual certification
[d] Provide the MONITORING FREQUENCY:		Daily	Monthly
Provide the DATA COLLECTION PROCEDURES that will be used:		Manual or electronic	Observation by certified personnel
Provide the DATA AVERAGING PERIOD for the purpose of determining whether an excursion or exceedance has occurred:			15 minutes

[a] Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

[b] Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or designated condition, or established as interdependent between more than one indicator. For CEMS, COMS, or PEMS, include the most recent certification test for the monitor.

[c] The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.

[d] Emission units with post-control PTE ≥ 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

RATIONALE AND JUSTIFICATION

Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide rationale and justification for the selection of EACH indicator and monitoring approach and EACH indicator range in order to meet the submittal requirements specified in 40 CFR §64.4.

6a) PSEU Designation:	6b) Regulated Air Pollutant:
NA	PM

7) **INDICATORS AND THE MONITORING APPROACH**: Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

A decrease in the pressure drop indicates a hole in a bag or leak in the system. An increase in the pressure drop indicates clogs in the system.

Method 9 Visible Emissions observations is an EPA standard for determining compliance with visible emissions standards.

8) **INDICATOR RANGES**: Provide the rationale and justification for the selection of the indicator ranges. The rationale and justification shall indicate how **EACH** indicator range was selected by either a COMPLIANCE OR PERFORMANCE TEST, a TEST PLAN AND SCHEDULE, or by ENGINEERING ASSESSMENTS. Depending on which method is being used for each indicator range, include the specific information required below for that specific indicator range. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

- COMPLIANCE OR PERFORMANCE TEST (Indicator ranges determined from control device operating parameter data obtained during a compliance or performance test conducted under regulatory specified conditions or under conditions representative of maximum potential emissions under anticipated operating conditions. Such data may be supplemented by engineering assessments and manufacturer's recommendations). The rationale and justification shall INCLUDE a summary of the compliance or performance test results that were used to determine the indicator range, and documentation indicating that no changes have taken place that could result in a significant change in the control system performance or the selected indicator ranges since the compliance or performance test was conducted.

- TEST PLAN AND SCHEDULE (Indicator ranges will be determined from a proposed implementation plan and schedule for installing, testing, and performing any other appropriate activities prior to use of the monitoring). The rationale and justification shall INCLUDE the proposed implementation plan and schedule that will provide for use of the monitoring as expeditiously as practicable after approval of this CAM plan, except that in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval.

- ENGINEERING ASSESSMENTS (Indicator Ranges or the procedures for establishing indicator ranges are determined from engineering assessments and other data, such as manufacturers' design criteria and historical monitoring data, because factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary). The rationale and justification shall INCLUDE documentation demonstrating that compliance testing is not required to establish the indicator range.

RATIONALE AND JUSTIFICATION:

The pressure drop is per operating parameters of the baghouse.

Visible Emissions limits are set by the EPA and permit conditions.

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

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a. The PSEU is located at a major source that is required to obtain a Title V permit;

b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is NOT exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
- Stratospheric Ozone Protection Requirements.
- Acid Rain Program Requirements.
- Emission Limitations or Standards for which a WVDEP Division of Air Quality Title V permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
- An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).

c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;

d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND

e. The PSEU is NOT an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

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☐ SIGNIFICANT MODIFICATION TO LARGE PSEUs. **ONLY** large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, Only address the appropriate monitoring requirements affected by the significant modification.

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PSEU DESIGNATION	DESCRIPTION	POLLUTANT	CONTROL DEVICE	[b] EMISSION LIMITATION or STANDARD	[c] MONITORING REQUIREMENT
NA	Woodworking Equipment	PM10	DC-2	0.93 lb/hr and 3.3 tpy	Daily recording of pressure drop and monthly observations of visible emissions.
EXAMPLE Boiler No. 1	Wood-Fired Boiler	PM	Multiclone	45CSR§2-4.1.c.; 9.0 lb/hr	Monitor pressure drop across multiclone: Weekly inspection of multiclone

[a] If a control device is common to more than one PSEU, one monitoring plan may be submitted for the control device with the affected PSEUs identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a). If a single PSEU is controlled by more than one control device similar in design and operation, one monitoring plan for the applicable control devices may be submitted with the applicable control devices identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a).

[b] Indicate the emission limitation or standard for any applicable requirement that constitutes an emission limitation, emission standard, or standard of performance (as defined in 40 CFR §64.1).

[c] Indicate the monitoring requirements for the PSEU that are required by an applicable regulation or permit condition.

CAM MONITORING APPROACH CRITERIA			
Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for EACH indicator selected for EACH PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. if more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.			
4a) PSEU Designation: **NA**	**4b) Pollutant:** **PM**	**4c) [a] Indicator No. 1:** Pressure drop	**4d) [a] Indicator No. 2:** **Visible Emissions**
5a) GENERAL CRITERIA Describe the MONITORING APPROACH used to measure the indicators:		Read the pressure drop gauge	Method 9
[b] Establish the appropriate INDICATOR RANGE or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:		0.5 to 4.0 inches of water	Less than 10%
5b) PERFORMANCE CRITERIA Provide the SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA, such as detector location, installation specifications, and minimum acceptable accuracy:		Pressure drop from inlet to outlet	According to Method 9
[c] For new or modified monitoring equipment, provide VERIFICATION PROCEDURES, including manufacturer's recommendations, TO CONFIRM THE OPERATIONAL STATUS of the monitoring:		Periodic calibration	Semi Annual certification
Provide QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):		Periodic calibration	Semi Annual certification
[d] Provide the MONITORING FREQUENCY:		Daily	Monthly
Provide the DATA COLLECTION PROCEDURES that will be used:		Manual or electronic	Observation by certified personnel
Provide the DATA AVERAGING PERIOD for the purpose of determining whether an excursion or exceedance has occurred:			15 minutes

[a] Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

[b] Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or designated condition, or established as interdependent between more than one indicator. For CEMS, COMS, or PEMS, include the most recent certification test for the monitor.

[c] The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.

[d] Emission units with post-control PTE ≥ 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

RATIONALE AND JUSTIFICATION

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6a) PSEU Designation:	6b) Regulated Air Pollutant:
NA	PM

7) **INDICATORS AND THE MONITORING APPROACH**: Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

A decrease in the pressure drop indicates a hole in a bag or leak in the system. An increase in the pressure drop indicates clogs in the system.

Method 9 Visible Emissions observations is an EPA standard for determining compliance with visible emissions standards.

8) **INDICATOR RANGES**: Provide the rationale and justification for the selection of the indicator ranges. The rationale and justification shall indicate how **EACH** indicator range was selected by either a COMPLIANCE OR PERFORMANCE TEST, a TEST PLAN AND SCHEDULE, or by ENGINEERING ASSESSMENTS. Depending on which method is being used for each indicator range, include the specific information required below for that specific indicator range. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

- COMPLIANCE OR PERFORMANCE TEST (Indicator ranges determined from control device operating parameter data obtained during a compliance or performance test conducted under regulatory specified conditions or under conditions representative of maximum potential emissions under anticipated operating conditions. Such data may be supplemented by engineering assessments and manufacturer's recommendations). The rationale and justification shall INCLUDE a summary of the compliance or performance test results that were used to determine the indicator range, and documentation indicating that no changes have taken place that could result in a significant change in the control system performance or the selected indicator ranges since the compliance or performance test was conducted.

- TEST PLAN AND SCHEDULE (Indicator ranges will be determined from a proposed implementation plan and schedule for installing, testing, and performing any other appropriate activities prior to use of the monitoring). The rationale and justification shall INCLUDE the proposed implementation plan and schedule that will provide for use of the monitoring as expeditiously as practicable after approval of this CAM plan, except that in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval.

- ENGINEERING ASSESSMENTS (Indicator Ranges or the procedures for establishing indicator ranges are determined from engineering assessments and other data, such as manufacturers' design criteria and historical monitoring data, because factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary). The rationale and justification shall INCLUDE documentation demonstrating that compliance testing is not required to establish the indicator range.

RATIONALE AND JUSTIFICATION:

The pressure drop is per operating parameters of the baghouse.

Visible Emissions limits are set by the EPA and permit conditions.

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at http://www.epa.gov/ttn/emc/cam.html

CAM APPLICABILITY DETERMINATION

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a. The PSEU is located at a major source that is required to obtain a Title V permit;

b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is NOT exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
- Stratospheric Ozone Protection Requirements.
- Acid Rain Program Requirements.
- Emission Limitations or Standards for which a WVDEP Division of Air Quality Title V permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
- An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).

c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;

d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND

e. The PSEU is NOT an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit:

☐ RENEWAL APPLICATION. **ALL** PSEUs for which a CAM plan has NOT yet been approved need to be addressed in this CAM plan submittal.

☒ INITIAL APPLICATION (submitted after 4/20/98). **ONLY** large PSEUs (i. e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels) need to be addressed in this CAM plan submittal.

☐ SIGNIFICANT MODIFICATION TO LARGE PSEUs. **ONLY** large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, Only address the appropriate monitoring requirements affected by the significant modification.

3) [a] BACKGROUND DATA AND INFORMATION					
Complete the following table for **all** PSEUs that need to be addressed in this CAM plan submittal. This section is to be used to provide background data and information for each PSEU In order to supplement the submittal requirements specified in 40 CFR §64.4. If additional space is needed, attach and label accordingly.					
PSEU DESIGNATION	DESCRIPTION	POLLUTANT	CONTROL DEVICE	[b] EMISSION LIMITATION or STANDARD	[c] MONITORING REQUIREMENT
NA	Woodworking Equipment	PM10	DC-4	0.47 lb/hr and 1.7 tpy	Daily recording of pressure drop and monthly observations of visible emissions.
EXAMPLE Boiler No. 1	Wood-Fired Boiler	PM	Multiclone	45CSR§2-4.1.c.; 9.0 lb/hr	Monitor pressure drop across multiclone: Weekly inspection of multiclone

[a] If a control device is common to more than one PSEU, one monitoring plan may be submitted for the control device with the affected PSEUs identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a). If a single PSEU is controlled by more than one control device similar in design and operation, one monitoring plan for the applicable control devices may be submitted with the applicable control devices identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a).

[b] Indicate the emission limitation or standard for any applicable requirement that constitutes an emission limitation, emission standard, or standard of performance (as defined in 40 CFR §64.1).

[c] Indicate the monitoring requirements for the PSEU that are required by an applicable regulation or permit condition.

CAM MONITORING APPROACH CRITERIA			
Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for EACH indicator selected for EACH PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. if more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.			
4a) PSEU Designation: **NA**	**4b) Pollutant:** **PM**	**4c) [a] Indicator No. 1:** Pressure drop	**4d) [a] Indicator No. 2:** **Visible Emissions**
5a) GENERAL CRITERIA Describe the MONITORING APPROACH used to measure the indicators:		Read the pressure drop gauge	Method 9
[b] Establish the appropriate INDICATOR RANGE or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:		0.5 to 4.0 inches of water	Less than 10%
5b) PERFORMANCE CRITERIA Provide the SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA, such as detector location, installation specifications, and minimum acceptable accuracy:		Pressure drop from inlet to outlet	According to Method 9
[c] For new or modified monitoring equipment, provide VERIFICATION PROCEDURES, including manufacturer's recommendations, TO CONFIRM THE OPERATIONAL STATUS of the monitoring:		Periodic calibration	Semi Annual certification
Provide QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):		Periodic calibration	Semi Annual certification
[d] Provide the MONITORING FREQUENCY:		Daily	Monthly
Provide the DATA COLLECTION PROCEDURES that will be used:		Manual or electronic	Observation by certified personnel
Provide the DATA AVERAGING PERIOD for the purpose of determining whether an excursion or exceedance has occurred:			15 minutes

[a] Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

[b] Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or designated condition, or established as interdependent between more than one indicator. For CEMS, COMS, or PEMS, include the most recent certification test for the monitor.

[c] The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.

[d] Emission units with post-control PTE ≥ 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

RATIONALE AND JUSTIFICATION

Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide rationale and justification for the selection of EACH indicator and monitoring approach and EACH indicator range in order to meet the submittal requirements specified in 40 CFR §64.4.

6a) PSEU Designation:	6b) Regulated Air Pollutant:
NA	PM

7) **INDICATORS AND THE MONITORING APPROACH**: Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

A decrease in the pressure drop indicates a hole in a bag or leak in the system. An increase in the pressure drop indicates clogs in the system.

Method 9 Visible Emissions observations is an EPA standard for determining compliance with visible emissions standards.

8) **INDICATOR RANGES**: Provide the rationale and justification for the selection of the indicator ranges. The rationale and justification shall indicate how **EACH** indicator range was selected by either a COMPLIANCE OR PERFORMANCE TEST, a TEST PLAN AND SCHEDULE, or by ENGINEERING ASSESSMENTS. Depending on which method is being used for each indicator range, include the specific information required below for that specific indicator range. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

- COMPLIANCE OR PERFORMANCE TEST (Indicator ranges determined from control device operating parameter data obtained during a compliance or performance test conducted under regulatory specified conditions or under conditions representative of maximum potential emissions under anticipated operating conditions. Such data may be supplemented by engineering assessments and manufacturer's recommendations). The rationale and justification shall INCLUDE a summary of the compliance or performance test results that were used to determine the indicator range, and documentation indicating that no changes have taken place that could result in a significant change in the control system performance or the selected indicator ranges since the compliance or performance test was conducted.

- TEST PLAN AND SCHEDULE (Indicator ranges will be determined from a proposed implementation plan and schedule for installing, testing, and performing any other appropriate activities prior to use of the monitoring). The rationale and justification shall INCLUDE the proposed implementation plan and schedule that will provide for use of the monitoring as expeditiously as practicable after approval of this CAM plan, except that in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval.

- ENGINEERING ASSESSMENTS (Indicator Ranges or the procedures for establishing indicator ranges are determined from engineering assessments and other data, such as manufacturers' design criteria and historical monitoring data, because factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary). The rationale and justification shall INCLUDE documentation demonstrating that compliance testing is not required to establish the indicator range.

RATIONALE AND JUSTIFICATION:

The pressure drop is per operating parameters of the baghouse.

Visible Emissions limits are set by the EPA and permit conditions.

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at http://www.epa.gov/ttn/emc/cam.html

CAM APPLICABILITY DETERMINATION

1) Does the facility have a PSEU (Pollutant-Specific Emissions Unit considered separately with respect to **EACH** regulated air pollutant) that is subject to CAM (40 CFR Part 64), which must be addressed in this CAM plan submittal? To determine applicability, a PSEU must meet **all** of the following criteria (*If No, then the remainder of this form need not be completed*): ☒ YES ☐ NO

a. The PSEU is located at a major source that is required to obtain a Title V permit;

b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is NOT exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
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- An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).

c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;

d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND

e. The PSEU is NOT an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit:

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NA	Woodworking Equipment	PM10	DC-5	6.10 lb/hr	Daily recording of pressure drop and monthly observations of visible emissions.
EXAMPLE Boiler No. 1	Wood-Fired Boiler	PM	Multiclone	45CSR§2-4.1.c.; 9.0 lb/hr	Monitor pressure drop across multiclone: Weekly inspection of multiclone

[a] If a control device is common to more than one PSEU, one monitoring plan may be submitted for the control device with the affected PSEUs identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a). If a single PSEU is controlled by more than one control device similar in design and operation, one monitoring plan for the applicable control devices may be submitted with the applicable control devices identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a).

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4a) PSEU Designation: **NA**	**4b) Pollutant:** **PM**	**4c) [a] Indicator No. 1:** Pressure drop	**4d) [a] Indicator No. 2:** **Visible Emissions**
5a) GENERAL CRITERIA Describe the MONITORING APPROACH used to measure the indicators:		Read the pressure drop gauge	Method 9
[b] Establish the appropriate INDICATOR RANGE or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:		0.5 to 4.0 inches of water	Less than 10%
5b) PERFORMANCE CRITERIA Provide the SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA, such as detector location, installation specifications, and minimum acceptable accuracy:		Pressure drop from inlet to outlet	According to Method 9
[c] For new or modified monitoring equipment, provide VERIFICATION PROCEDURES, including manufacturer's recommendations, TO CONFIRM THE OPERATIONAL STATUS of the monitoring:		Periodic calibration	Semi Annual certification
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Provide the DATA AVERAGING PERIOD for the purpose of determining whether an excursion or exceedance has occurred:			15 minutes

[a] Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

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4a) PSEU Designation: **NA**	**4b) Pollutant:** **PM**	**4c) [a] Indicator No. 1:** Pressure drop	**4d) [a] Indicator No. 2:** **Visible Emissions**
5a) GENERAL CRITERIA Describe the MONITORING APPROACH used to measure the indicators:		Read the pressure drop gauge	Method 9
[b] Establish the appropriate INDICATOR RANGE or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:		0.5 to 4.0 inches of water	Less than 10%
5b) PERFORMANCE CRITERIA Provide the SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA, such as detector location, installation specifications, and minimum acceptable accuracy:		Pressure drop from inlet to outlet	According to Method 9
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Provide QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):		Periodic calibration	Semi Annual certification
[d] Provide the MONITORING FREQUENCY:		Daily	Monthly
Provide the DATA COLLECTION PROCEDURES that will be used:		Manual or electronic	Observation by certified personnel
Provide the DATA AVERAGING PERIOD for the purpose of determining whether an excursion or exceedance has occurred:			15 minutes

[a] Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

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[c] The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.

[d] Emission units with post-control PTE ≥ 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

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6a) PSEU Designation:	6b) Regulated Air Pollutant:
NA	PM

7) **INDICATORS AND THE MONITORING APPROACH**: Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

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